

2011

Assessment of the Implementation of the Safer Social Networking Principles for the EU on 14 Websites: Summary Report

May, 2011

**By request of the European Commission
under the Safer Internet Programme**



European Commission
Information Society and Media

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EXECUTIVE SUMMARY

- This report is part of the European Commission's commitment to support the industry self-regulatory initiative - the "Safer Social Networking Principles" (from now on referred to as ("the Principles") signed by 21 social networking companies to date. The report summarizes the findings of the 2nd assessment (Phase A) where 14 social networking websites (SNS) were tested. The services tested in this Phase were: Arto, Bebo, Facebook, Giovanni, Hyves, IRC-Galleria, Myspace, Nasza-Klasa, Netlog, One, Rate, SchuelerVZ (Vznet Netzwerke), Tuenti and Zap. All these services were tested in their main language versions except Facebook, Myspace and Netlog which were tested in two language versions. This report also summarizes the main findings related to the analysis of the corresponding self-declarations submitted by the signatories of the Principles involved in this Phase where they explain how they implement safety measures on their websites.
- The second assessment of the Safer Social Networking Principles aims at determining how well the Principles each SNS committed itself to implement have been put into operation on their corresponding websites. The methodology of this second assessment varies slightly in relation to the first evaluation carried out in 2009. Instead of testing all the SNS at once, two Phases have been foreseen. In Phase A (results summarized in this report) all the typical SNS have been tested while in Phase B different platforms, namely video-sharing platforms, photo-sharing platforms, virtual worlds, gaming platforms and other platforms will be tested.
- This report consists of two parts. The first part is a general analysis of the main findings across the services assessed. The second part is comprised of individual testing reports of each of the 14 services involved in Phase A.
- All commitments of the services were assessed on two main aspects. Firstly, the individual self-declarations submitted by each service provider were assessed against the Safer Social Networking Principles. Of the 14 services evaluated, 3 self-declarations were assessed as "very satisfactory", 9 as "rather satisfactory" and 2 as "unsatisfactory".
- Secondly, all the services were also assessed according to the way each provider implemented their individual commitment (as expressed in their self-declaration) on their respective website. When looking at how satisfactory the implementation of these commitments was, we can see that 4 services implemented their commitments in a *very satisfactory* way, 6 services implemented their commitment *rather satisfactorily* while 4 services implemented their commitment *unsatisfactorily* on an overall level. In sum, the self-declarations of the services evaluated were slightly better assessed than their implementation on the corresponding websites.

MAIN RESULTS OF THE ANALYSIS OF THE SELF-DECLARATIONS

- The analysis of the self-declarations of the 14 Social Networking Sites evaluated shows that Principle 7 "Assess the means for reviewing illegal or prohibited content/conduct" and Principle 5 "Respond to notifications of illegal content or conduct" were the best evaluated. Indeed, 7 of the 14 SNS analysed were considered as *very satisfactory* and 7 as *rather satisfactory* in relation to Principle 7. No SNS was assessed as unsatisfactory regarding this Principle. Principle 5 "Respond to notifications of illegal content or conduct" was assessed as *very satisfactory* in 6 services, as *rather satisfactory* in 6 services and as *unsatisfactory* in only 2 services.
- The poorest assessed Principle in relation to the self-declarations was Principle 6 "Enable and encourage users to employ a safe use approach to personal information and privacy". Here, 4 services

were assessed as *unsatisfactory*, 7 as *rather satisfactory* and only 3 as *very satisfactory*. The main weakness regarding the assessment of this Principle in the self-declarations had to do with the lack of explicit information regarding the characteristics (e.g. age-appropriateness, availability, user-friendliness, etc.) of the privacy settings on the services and the lack of information (in their self-declarations) regarding whether these services provide users with supporting information to help them make informed decisions about their privacy settings.

MAIN RESULTS OF THE TESTS ON THE WEBSITES

- In terms of the implementation of the individual commitments expressed in the self-declarations on the SNS websites, Principles 1 “Raise awareness” and Principle 4 “Easy mechanisms for reporting violations” were the best assessed.
- In relation to Principle 1, 5 services were assessed as *very satisfactory* on their website while 9 services were evaluated as *rather satisfactory*. No service was evaluated as *unsatisfactory* regarding this Principle. Indeed, all the SNSs evaluated provided safety information, guidance and/or educational materials for minors, parents, teachers and/or carers and most of the times this information was *age-appropriate* and *easy-to-understand*. However, as the tests demonstrated, this information was not always easy to find.
- As regards Principle 4, 3 SNS providers were assessed as *very satisfactory*, 10 as *rather satisfactory* and only 1 as *unsatisfactory*. Services that were assessed as *very satisfactory* on their website provided reporting mechanisms that were both user-friendly and effective.
- Principle 3 “Empower users” was the least well evaluated Principle on the website with as much as 6 services being assessed as *unsatisfactory*, 5 as *rather satisfactory* and only 3 as *very satisfactory*. Arguably, the main weakness in the implementation of this Principle is that in most of the SNS tested the profiles of minors can either be accessed by users beyond the minors’ accepted list of contacts (including both “friends of friends” and non-friends) and/or minors could be contacted (e.g. via personal messages) by these (adult) non-friends.
- No service provider implemented their commitments (as expressed in their individual self-declaration) *very satisfactorily* on *all* the 5 Principles tested on the SNS websites.

SUMMARY PRINCIPLE 1 – “RAISE AWARENESS”

- In terms of the availability and easiness of the safety information on the websites, the assessment of Principle 1 is positive on the websites and consistent with the providers’ commitments expressed in their individual self-declarations.
- **The 14 services tested provide at least some type of safety information, guidance and/or educational materials on their websites targeted at children, parents, teachers and/or carers.** This information mainly includes topics such as bullying, implications of divulging one’s personal information, reputation management, hate speech and pornographic and/or sexual content. Information on other topics such as self-harm (suicide, anorexia, bulimia, etc.) or conduct-related risks is rare.
- Only in one of the services the information provided was not specifically targeted at minors, however general safety information and tips were available on the site. Compared to last year’s assessment that shows that several websites tested did not provide safety tips and information specifically targeted towards children and/or teenagers, this year’s assessment shows progress in this area.
- **Regarding the format of the safety information available, the 14 services tested provide this information in textual format, 6 services also provide safety information in other more child-friendly formats such as videos, audio fragments and/or comics.**

- The information related to safety was quite clear and age-appropriate for minors (above the minimum age required by the SNS) in all but one service (which did not provide safety information specially targeted at children, but general safety information, mainly targeted at parents and carers). The safety information and tips for teachers and parents were always clear and easy-to-understand.
- The safety information available on the SNS websites is not always easy to find. Indeed, only in 7 websites was the safety information easy to find. This is both in the case of information targeted at minors as information targeted at adults. **Thus, only in half of the SNS evaluated was this information both easy to find and to understand by minors.** These results show that compared to last year's assessment (where this information was both easy to find and easy to understand on 9 of the 14 websites tested in this phase), the SNS evaluated in this Phase have improved considerably in terms of the easiness of comprehension of the safety information provided, but the accessibility of their safety information remains a weak point in half of the websites tested.
- All the SNS provide Terms of Use, Community guidelines, Statements of Rights and Responsibilities and/or House rules. In many cases, though, this information is either difficult to access and/or difficult to understand, especially for younger audiences.
- All the SNS evaluated include explicit information on what constitutes inappropriate or forbidden behaviour on their services (e.g. uploading illegal or inappropriate content, bullying other users, exploiting minors in any way, etc.) and the consequences thereof (e.g. being reprimanded, having one's account suspended, temporarily cancelled or deleted). **Only in 4 services the Terms of Use (meant for the general public) are easy to understand even for minors. In 6 of the 14 SNS tested an additional, adapted, child-friendly version of the Terms of Use or Code of Conduct is provided (apart from the general Terms of Use). This adapted version of the Terms is presented in either textual and/or audio-visual format which clearly illustrates forbidden behaviour on the site and the possible consequences of such inappropriate behaviours.** In sum, 9 sites provided either Terms of Use which were easy for minors to understand and/or an additional child-friendly, adapted version of the Terms of Use or Code of Conduct. One site provided both an easy-to-understand version of the Terms of Use and an additional, adapted, child-friendly version of such Terms. Still, only in 6 sites were the Terms of Use easy to find.

SUMMARY PRINCIPLE 2 –"AGE APPROPRIATE SERVICES"

- **11 of the 14 SNS have set up a minimum age requirement in order for users to be able to sign up to their services. In 4 of these services the minimum age requirement is 12, in 5 the minimum age requirement is 13 and in 2 it is 14. In 3 SNS no minimum age registration applies.**
- According to their self-declarations, in 2 of the non age-restricted services parental consent was required from children younger than 16 and 18, respectively, in order to sign-up on the SNS site. However, this was not confirmed during testing because minors could sign up to those sites even without being asked to provide any proof of parental consent.
- Confirming the results of the first assessment of the Principles, self-declaration of age was the most common mechanism employed by service providers in order to verify a user's age. During testing national researchers attempted to create a profile of an underage user (a 9-year old child) on the service they were testing. The results of this test showed that 9 of the 11 SNS intended to be age-restricted effectively did not allow sign-up by underage users *if* they provided their "real" age at registration. 2 supposedly age-restricted services immediately allowed underage users to register on their services.
- Testing on the websites also revealed that in all the SNS intended to be age-restricted users could eventually register on the site by changing their initial age to one just above the minimum age

required by the SNS. In 2 services, this process was a little bit more difficult because cookies had been installed to avoid re-registration. However, even in these cases it was possible for a minor to sign up once the cookies were removed (e.g. simply closing the browser and opening it again removed the cookies in those cases where cookies had been installed) and by changing the date of birth to one just above the minimum age required. Similar results were observed in the first assessment of the Principles showing that minimum age registration is an aspect that requires further attention.

- According to the self-declaration 10 SNS restrict access to certain types of content and/or services for minors. On the website, 4 out of these 10 services explicitly restricted access to certain types of content and or sections intended for adult use only. In the majority of the services tested, however, this was not necessary because the information and the services provided by the SNSs were always appropriate for all audiences. Nevertheless, in 3 cases it was possible for minors to see some inappropriate content, for instance discussions about sexual positions in a supposedly “adult only” forum, alcohol ads or highly sexy pictures and some inappropriate comments about them on some adults’ profiles.
- Although the Principles do not include provisions on advertising, 10 of the 14 SNSs explicitly refer to advertising in their self-declarations. These 10 service providers state that advertising on the services they run is always age-appropriate and that children are not confronted with any adult-oriented advertising such as alcohol brands or cigarettes on their websites. In the tests of 2 of the 10 SNS committed to restricting the exposure of minors to inappropriate advertising (as stated in their self-declaration) some advertising that could be considered as not appropriate for minors was found. In one of them pages dedicated to alcohol brands could be accessed by minors. In the other one there was a “fake celebrity ad” that when clicked on it opened a video chat application. This application opened the tester’s webcam and prompted the tester to “call a friend or meet someone new”.

SUMMARY PRINCIPLE 3 – “EMPOWER USERS”

- 11 self-declarations state that the “default” profiles of minors can only be viewed by friends and 9 services explicitly state that very little or no information from the minors is displayed in their profiles to “non-friends”. The tests on the website, however, showed that in 11 services a considerable amount of personal information was displayed to users beyond the minor’s approved contacts list (including non-friends but also “friends of friends” who are, strictly speaking, not part of the minor’s approved contacts list). In some cases, pictures, the full name of the minor, the name and sometimes the address of the school they attend, comments posted on the minor’s profiles, the minor’s online status, interests, hobbies, etc. were displayed to either “friends of friends” and/or non-friends. **Only 2 of the SNS assessed make minors’ personal information visible only to their friends by default, i.e. they display very little and non-identifiable information from the minor to (non) users beyond the minor’s approved contact list (including “friends of friends”). Another invitation-only¹ service displays very little, although potentially identifiable information from the minor to “friends of friends”, but not beyond.** Compared to last years’ results no improvement was observed regarding the implementation of this measure.
- Only in 4 services minors could be contacted only by friends by default. In the other 10 services minors could be contacted either by friends of friends (9 services) and/or by non-friend users of the service (9 services) via personal messages and/or by writing comments on their public profiles (e.g. in the public profile, in photos, in blogs, etc.). **Testing on the website also revealed that, by default, only in 2 of the 14 websites assessed, the personal information of minors was both only visible to friends and minors could be contacted by friends only.** In another invitation-only service, some potentially identifiable information from the minor was visible to the minors’ contacts and their friends. **In spite**

¹ 2 of the 14 service providers tested are “invitation-only” services. This means that in order to create an account on these SNS new users must first receive an invitation from an existing user. Without such an invitation it is impossible to sign up to the SNS.

of this, non-friends (including “friends of friends”) could not get in touch with minor and, thus, minors could only be contacted by their “friends”.

- **In 12 of the 14 services tested profiles of minors could not be found via external search engines such as Google, Bing or Yahoo!** Last year’s assessment revealed that only 6 of the 14 services tested in this phase made it impossible for the private profiles of minors to be found through external search engines, which shows a great improvement in terms of the (un)searchability of minor’s profiles. In most services (11 in total), though, the profiles of minors could be found by other non-friend users via the internal search engine of the SNS.
- On 7 of the 14 websites tested only friends were allowed to post comments on the minors’ public profile. In the other 7 SNSs, by default, non-friends could also post comments on minors’ profiles.
- In all the services users could block other users and reject friends’ requests. Pre-moderate comments or content before being published on one’s profile was only possible on 3 services.
- As shown in last year’s assessment, deleting unwanted comments was possible in most of the services (11 of the 14 services tested). In the other 3 cases it was either not possible for users to delete unwanted comments/content or users had to pay a certain amount of money in order to be able to do so.
- In two of the SNS websites tested some functionalities were restricted unless users (including minors) paid a small amount of money. These paid functionalities include, for instance, uploading, changing and editing photos; rating photos with the highest score; etc. Also, changing one’s birth date (previously provided in the registration) was possible to do by paying the equivalent to 0.33 euro.

SUMMARY PRINCIPLE 4 – “EASY TO USE MECHANISMS FOR REPORTING VIOLATIONS”

- **All the 14 services tested provided at least one mechanism for reporting inappropriate content or contact on their website including a general report button in 13 of the 14 SNS tested.** Report forms were available in 13 services and reporting via e-mail was possible in 7 services. Only one of the services did not provide any dedicated mechanism to report abuse, but reporting could still be done by sending an e-mail to the website’s administration. 11 services provided dedicated report buttons placed next to user-generated content such as pictures, videos or comments, as well.
- Testing on the website revealed that 12 of the services assessed provide age-appropriate reporting mechanisms, 11 services provide user-friendly mechanisms and 12 of the reporting mechanisms were overall assessed as easily accessible. On 11 of the 14 services tested, the reporting mechanisms were at all times available. 12 services provided users with supporting information in order to make an effective report.
- The reporting mechanisms were tested by creating a realistic bullying situation on the SNS where a fake “bullied” child contacted the provider asking for help to remove offending content posted on her profile. Only in 7 cases reports were acknowledged by the provider indicating that their reports were being handled. In one of these services the report was acknowledged in one language version of the site, but not in the other version tested.
- **In 10 services the reports were responded. But in one of these services (tested in two languages) the report was responded in only one of the two language versions tested.** In 7 out of these 10 cases these responses were prompt (taking between a few minutes to a few hours, but never more than a day to arrive). In 3 cases the responses took between 4 and 10 days to arrive. In one of the websites tested in two languages a reply was obtained within 1 day in one version of the site, but no reply was received in the other language version tested. The type of response obtained varied from company to company ranging from personalised e-mails explaining to minors how to delete the offending content themselves and giving minors concrete tips on how to deal with this type of situation to replies mentioning that the offending content had been/would be reviewed and eventually removed from the

site. **These results show considerable improvement as compared to last year's assessment that revealed that only 5 of the 14 websites tested in this phase replied to reports asking for help.**

- Apart from the fact that the provider sent a reply to the (reporting) minor, attention was paid to what actually happened with the offending content (bullying pictures and nasty comments and/or messages created for this test) posted on the profile of the "victim". The tests show that only in 6 cases was the inappropriate reported content removed from the site and in only 4 SNS some kind of action was taken against the "bullies" (created for this test) such as deleting their account or warning the offenders that this type of behaviour was not allowed on the SNS and that future offenses could end up with their accounts being terminated.

SUMMARY PRINCIPLE 5 – "RESPOND TO NOTIFICATIONS OF ILLEGAL CONTENT/CONDUCT"

- Because of ethical reasons Principle 5 was not tested on the website.
- In their self-declaration 10 of the 14 service providers claim that they have effective processes in place to review and remove offending content from their websites and that these processes are expeditious. The other 4 services analysed do not explicitly refer to this in their self-declarations.
- All the service providers assessed in this Phase claimed to share reports of illegal content with the corresponding law enforcement bodies. Last year's assessment showed similar results with almost all the SNS assessed (22 out of 24 SNS) stating that they shared reports of illegal content with the corresponding law enforcement bodies.
- Only 6 of the websites analysed explicitly state in their self-declarations that they provide links on their websites to other local agencies and organisations in order to support the reporting of illegal content or conduct on their services. 9 services do not explicitly refer to this in their self-declaration.

SUMMARY PRINCIPLE 6 – "ENCOURAGE SAFE USE APPROACH TO PRIVACY"

- **All the 14 services offer their users (included minors) a range of privacy settings so that they can manage their experience on the websites.** The range and modality of privacy options vary, however, from services to service.
- In some services privacy options are limited allowing users only to select from a set of pre-defined privacy settings so that users can only choose to either display *all* their information and user-generated content to *everyone*, to *friends only* or to *no one*. Other services offer a wider range of options including the possibility to display some sections of one's profile (as opposed to the whole profile) to pre-defined groups (e.g. "friends", "friends of friends" or "everyone"), but only 3 services offer *granular* settings allowing users to decide which individual piece(s) of content to share with which specific users or groups of users allowing users to have complete privacy control over every piece of content they post online.
- **Privacy settings are *user-friendly* in 13 of the 14 services analysed. In 12 services they are also *accessible at all times*.**
- **Privacy settings options are accompanied by supporting information in 11 of the 14 services assessed.** This supporting information helps users make informed decisions regarding their privacy settings options and supports users by instructing them on how to change their privacy settings. The supporting information found was mainly textual, but in a few cases other formats were provided such as video tutorials.

- In 13 out of the 14 services tested (some of) the information provided by minors during registration was automatically mapped into the user's profiles, but in most cases users were not made aware that this would happen. Still, in all the services that automatically mapped information into the user's profiles it was possible at a later stage to make private or public this information if users wished to.
- Deleting a profile was easy in all the SNS that provided this option (11 of the 14 analysed). In 3 cases it was only possible to deactivate one's profile, but not completely delete it. When deleting/deactivating one's profile 8 services clearly state what personal information they retain, but only 4 services explicitly informed users what would happen to their personal information once their profiles were deleted/deactivated.

SUMMARY PRINCIPLE 7- "REVIEWING ILLEGAL OR PROHIBITED CONTENT/CONDUCT"

- Because of ethical reasons, Principle 7 was not tested on the website.
- Principle 7 was assessed as *very satisfactory* in 7 services and as *rather satisfactory* in the other 7 services tested.
- The main mechanisms for SNSs to identify potential risks to minors are user-generated reports available in all the 14 services tested. According to the self-declarations, the use of automated mechanisms such as employing word filters or photo scanners to identify potential threats to minors is available in 11 of the 14 services tested and specially trained personnel reviews inappropriate content in 12 out of the 14 services analysed. In sum, some form of human and/or automated moderation is employed in all the SNS tested this year.
- According to the analysis of the self-declarations, human moderators are employed in 7 out of the 14 services analysed, however only in 5 of these services the self-declaration explicitly refers to the steps taken by the provider in order to minimize the risk of employing human moderators who may be unsuitable to work with minors.

INTRODUCTION

In 2008, as part of its Safer Internet Plus Programme, the European Commission gathered 18 of the major online social networks active in Europe as well as researchers and child welfare organizations to form a European Social Networking Task Force to discuss guidelines for the use of social networking sites by children and young people. As a result "the Safer Social Networking Principles for the EU" were developed by social networking services providers in consultation with the Task Force. The aim was to "provide good practice recommendations for the providers of social networking and other user interactive sites, to enhance the safety of children and young people using their services".

The guidelines were adopted voluntarily by the major online social networks active in Europe, and signed on Safer Internet Day on February 10th 2009.

The Principles are meant as a guidance to SNS providers when they seek to minimize potential harm to children and young people ("Safer Social Networking Principles of the EU," 2009: 1). They recommend a wide range of good practice approaches, allowing for the diversity and judgment of the social networks themselves in terms of relevance and implementation. Within the context of the Principles, "Social Networking Services" are defined as services that combine the following features ("Safer Social Networking Principles of the EU," 2009: 3):

- A platform that promotes online social interaction between two or more persons for the purposes of friendship, meeting other persons, or information exchange;
- Functionality that lets users create personal profile pages that contain information of their own choosing, such as the name or nickname of the user, photographs placed on the personal page by the

user, other personal information about the user, and links to other personal pages on the service of friends or associates of the user that may be accessed by other users or visitors to the service;

- Mechanisms to communicate with other users, such as a message board, electronic mail, or instant messenger; and
- Tools that allow users to search for other users according to the profile information they choose to make available to other users.

The first assessment was carried out in 2009 with results published in February 2010².

The core purpose of this second evaluation is to assess how satisfactorily 14 of the signatories of the *Safer Social Networking Principles for the EU* have implemented the commitments expressed in their self-declaration reports³ submitted between April 10th 2009 and December 16th 2010 in the services they run. This analysis was made by assessing the individual self-declaration reports⁴ against the principles and, then, comparing the results of this analysis against the testing on the corresponding SNS Services.

As opposed to the first evaluation carried out in 2009, this second assessment consists of 2 Phases. In Phase A 14 “typical” Social Networking Sites were assessed in the period December 2010 - January 2011. In Phase B, other SNS platforms will be evaluated including photo and video sharing platforms, virtual worlds, blogging and gaming platforms.

Table 1 lists the 14 Social Networks considered in this phase of the Second Assessment of the Safer Social Networking Principles for the EU. It includes the date of their accession to the Principles and the date of submission of the most updated version of their self-declarations. Please see Annex 4 of this report for more detailed information on the signatories and the relevant SNS services they offer.

Signatories	Date of accession to the Principles	Date of submission of the self-Updated self-declarations
Arto	10 February 2009	15 April 2009
Bebo	10 February 2009	17 April 2009
Facebook	10 February 2009	16 December 2010
Giovani	10 February 2009	02 July 2010
Hyves	10 February 2009	15 November 2010
MySpace	10 February 2009	14 November 2010
Nasza-klasa	10 February 2009	31 May 2010
Netlog	10 February 2009	03 July 2010
One.It	10 February 2009	17 June 2009
Rate.ee	9 June 2009	9 June 2009
SchuelerVZ	10 February 2009	26 May 2010
Sulake.com	10 February 2009	05 November 2010
Tuenti	12 June 2009	21 May 2010
ZAP	10 February 2009	17 April 2009

Table 1. Signatories Participating in Phase A of the 2nd Assessment of the Safer Social Networking Principles for the EU

² The results from the 1st assessment of the Safer Social Networking Principles for the EU can be consulted in the following link: http://ec.europa.eu/information_society/activities/social_networking/docs/final_report/first_part.pdf

³ All these reports are public and can be downloaded from the European Commission’s website: http://ec.europa.eu/information_society/activities/social_networking/eu_action/selfreg/index_en.htm#self_decl (link valid as of August 2009).

The first part of this report provides an overview of the implementation of the Principles by the 14 services analysed as a whole, by analyzing the main findings related to each Principle across the different services including specific examples of measures implemented. The second part of this report consists of individual reports summarising the main results of the tests carried out in each of the 14 SNS tested in this Phase.

METHODOLOGY

The 2nd Assessment of the Safer Social Networking Principles aims at determining how well the Principles each SNS committed itself to implement have been put into operation on their corresponding websites. As previously mentioned, the methodology of this 2nd assessment varies slightly in relation to 1st evaluation carried out in 2009 in that instead of testing all the SNS at once, two Phases have been foreseen. In Phase A (results summarized in this report) all the typical SNS have been tested while in Phase B different platforms, namely video-sharing platforms, photo-sharing platforms, virtual worlds, gaming platforms and other platforms will be tested.

The methodology employed in this Phase consists of three main parts, namely:

- (1) an analysis of the self-declarations submitted by the signatories;
- (2) the testing (from a user perspective) of the websites run by the signatories, and
- (3) the assessment of how satisfactory each SNS has been in the implementation of their individual commitments in relation to the Principles (as expressed in their individual self-declarations) on the websites they run.

In the second assessment all the individual self-declarations were analysed solely by the coordinator so as to ensure a maximum degree of objectivity during the assessment. During this second assessment national researchers carried out the tests on each SNS. These tests only evaluated Principles 1,2,3,4 and 6. Because of ethical reasons Principles 5 and 7 were not tested on the websites.

A standard questionnaire was used for testing websites. The analysis of the questionnaires and the reporting focused on those aspects each SNS had committed itself to implement in their individual self-declaration.

The coordinator analysed the results from the national tests for each principle. The way each principle had been implemented was assessed according to what was stated in each individual self-declaration. Three categories of assessment were established, namely, *very satisfactory*, *rather satisfactory* and *unsatisfactory*. As observed later on in the results section, it is possible that in a few cases some services, whose self-declaration was assessed as “unsatisfactory”, may have been evaluated as “satisfactory” in the implementation on their website. This is the case of some providers whose self-declaration does not provide thorough information on each and every measure they have actually implemented on the websites they run.

STEP 1: ANALYSIS OF THE SELF-DECLARATIONS

The first step of this assessment consisted in determining if each individual self-declaration was in line with the Safer Social Networking Principles. Each signatory's self-declaration was assessed by means of a questionnaire consisting of seven sections, each of which was devoted to evaluating one of the seven Safer Social Networking Principles⁵. Each section contained a series of questions that aimed to assess how well each SNS had addressed the most important facets of each Principle in their self-declarations.

At the end of each section of the questionnaire, the coordinator filled in a table summarizing how well each Principle had been implemented in the corresponding self-declaration (“*very satisfactorily*”, “*rather satisfactorily*” or “*unsatisfactorily*”) as well as areas for further improvement.

Finally, the analysis of the self-declarations also included a section where the coordinator referred to any relevant additional information/features/functionalities that the company may have included in their individual self-declaration but which were not included in the current version of the questionnaire.

⁵ For a full description of each of the Safer Social Networking Principles, please consult:
http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf

STEP 2: TESTING THE SNS WEBSITES

Following the analysis of the self-declarations, in Phase A each SNS was tested by one national researcher in the main their (main) local language of the signatories' website with the exception of Facebook, Myspace and Netlog which were tested in 2 language versions. Facebook was tested in both English and French, Myspace in English and Spanish and Netlog in Dutch and in German. In the case where SNSs were tested in two different languages, both testing results were merged into one report.

In order to create the right assessment instrument the testing questionnaire employed in the first assessment was reviewed and improved⁶. In concrete terms, several new items and new test situations were added. Besides, several statements were reworded or refined. To the extent possible, factual questions were used to operationalize subjective terms such as *"accessible"* or *"easy-to-understand"*.

The final testing instrument for Phase A is an online questionnaire comprising 5 sections, one for each of the principles assessed (Principles 1,2,3,4 and 6). Each section contains a set of questions (indicators) that evaluate the extent to which each SNS has addressed the Principles on their websites. Apart from the indicators contained in the online survey, alternative ways of implementing the Principles on the SNS were also taken into consideration. Indeed, national researchers were encouraged to refer to any alternative ways any particular Principle had been implemented on the website and which had not been covered by the testing scenario.

The methodology employed for this second assessment was based on the "mystery shopper" technique, where researchers had to set up profiles of minors and adults to carry out the tests. Each national researcher was provided with a standard testing scenario and a set of instructions that clearly explained how to perform the testing exercise. Providing such a standardized testing scenario helped ensure the consistency of the results across the different websites and by different national researchers. Together with a standardized testing scenario all national researchers were provided with a set of "personas" which served to create the necessary profiles to carry out the tests. A persona resembles classical user profiles, but with some important distinctions. It is an archetypical representation of real or potential users. The persona, thus, represents patterns of users' behaviour, goals and motives, compiled in a fictional description of a single individual. It also contains made-up personal details in order to make the persona more "tangible and alive" for the testing team. In our testing scenario, the personas fulfilled two main roles:

- (1) They provided relevant information (including a set of pictures) that was used to create realistic user profiles for the tests. By doing this we could also ensure that all the tests were carried out under the same conditions.
- (2) Because the persona model resembles classical user profiles, they can help to develop empathy with the target users. In this specific case, they were used to help adult national researchers think from the perspective of a child and/or an adolescent user.

The methodology allowed making a thorough and comprehensive assessment of each SNS individually. At the same time, because the questionnaire in this Phase was a standard one for all the 14 services assessed, it was possible to merge the data obtained into a common data set and conduct an overall analysis of the most relevant issues per Principle across all the SNSs evaluated.

Undoubtedly, this methodological approach also has its limitations. Arguably, the main one being that no minors were included in the testing process and thus, all the results presented in this report are solely based on the expert assessment carried out by adults. Even though a big effort has been made to ensure the consistency and validity of the methodology employed for this assessment, it is important to keep in mind that some aspects of the principles will necessarily be better evaluated with real children actually interacting with each of

⁶ The questionnaire employed during the 1st assessment of the Safer Social Networking Principles for the EU can be consulted in the following link (Annex 3):

http://ec.europa.eu/information_society/activities/social_networking/docs/final_report/first_part.pdf

the websites. However, the use of Personas helped to counteract to some extent this problem by supporting researchers think and make decisions which may be closer to the ones younger users would have actually made. Another limitation of this approach lies on the fact that all the tests (with the exception of the three websites that were tested in 2 different languages) were carried out by only one national researcher. Research in other fields (such as usability) has demonstrated that the results from expert evaluations can be maximised when expert evaluations are carried out by a group of experts (at least 2) rather than by one individual (Nielsen, 1990). This second shortcoming was overcome by the close collaboration between national researchers and the coordinator. The latter supported national researchers throughout the whole testing and analysis period and was consulted by national researchers whenever problems related to the analysis or interpretation of the data arose. Finally, it is important to mention that the testing was carried out in the period December 2010-January 2011 and therefore the results contained in this report refer to that period only.

GENERAL FINDINGS

In relation to the assessment of the self-declarations, Fig. 1 shows that 3 services were assessed as *very satisfactory* (11-14 points), 9 as *rather satisfactory* (6-10 points) and as 2 *unsatisfactory* (Less than 6 points⁷) (See Fig. 1).

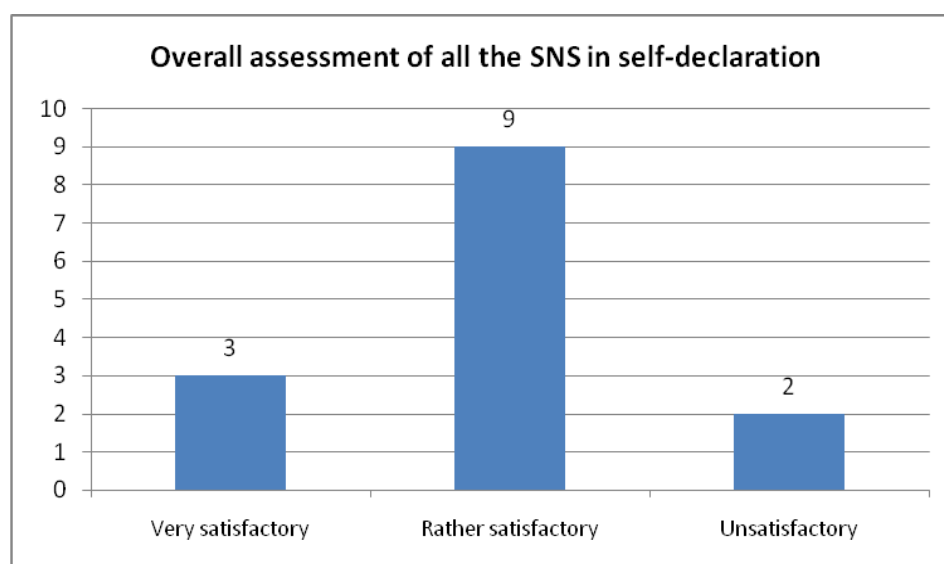


Fig. 1 Overall assessment of all SNS according to their self-declaration

In relation to the assessment of the self-declarations only one of the services was *very satisfactorily* assessed in all the Principles (See Fig. 2). 1 service was assessed as *very satisfactory* in 6 Principles, 1 service was assessed as *very satisfactory* in 4 Principles and 4 services were *very satisfactory* assessed in 2 Principles. Half of the signatories were assessed as very satisfactory in either one or no Principle.

⁷ In order to calculate this overall level of satisfaction, the scores obtained by each service provider across all the 7 principles assessed were added up. For each Principle assessed as *very satisfactory* 2 points were given, for each Principle assessed as *rather satisfactory* 1 point was given and whenever a Principle was assessed as *unsatisfactory* no points were assigned. In order to assess the overall satisfaction level of the implementation of the individual self-declarations on their respective websites, the same procedure was followed. However, the maximum score was lowered to 10 because only 5 Principles were tested on the website as opposed to 7 principles assessed in the case of the self-declarations.

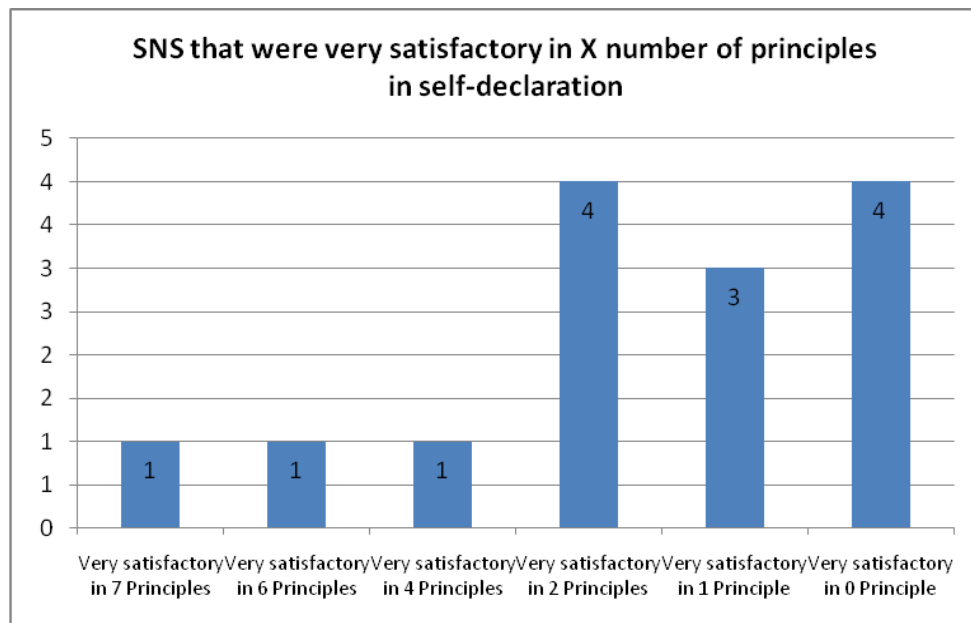


Fig. 2 SNS that were very satisfactory in X number of Principles in self-declaration

When looking at how satisfactory the implementation of the commitments (as expressed in the self-declarations) on the respective websites was, we can see that 4 services implemented their commitments in a *very satisfactory* way (8-10 points), 6 services implemented their commitment *rather satisfactorily* (4-7 points) while 4 services were *unsatisfactory* (1-3 points) on an overall level (See Fig. 3).

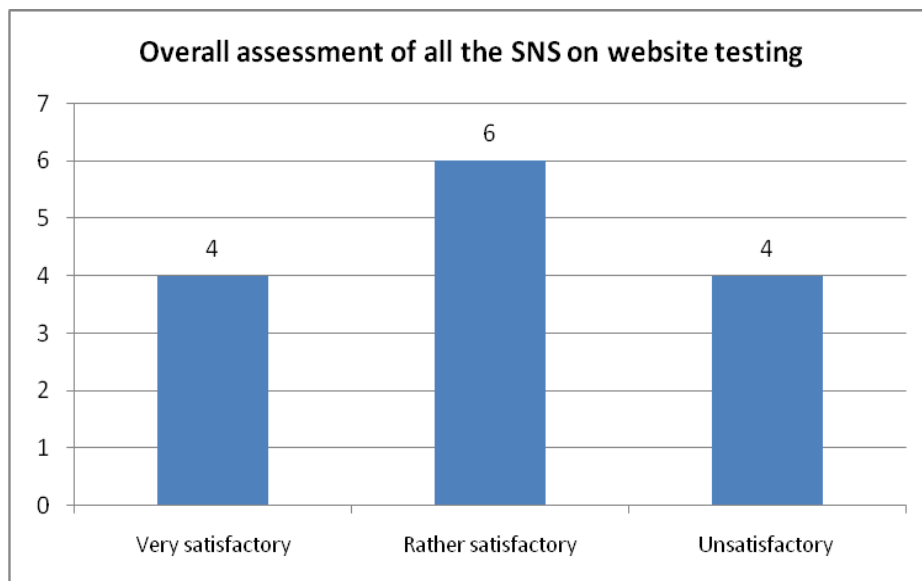


Fig. 3 Overall assessment of all the SNS on website testing

No service provider was assessed as very satisfactory in relation to the implementation of their individual commitment (as expressed in their individual self-declaration) on all the 5 Principles tested on the website (see Fig.4). Still, 2 services were assessed as *very satisfactory* in 4 of the 5 Principles tested, 2 were assessed as *very satisfactory* on 3 Principles and 1 provider was assessed as very satisfactory in 2 Principles. 3 service providers were assessed as *very satisfactory* in only 1 Principle while 6 were not assessed as *very satisfactory* on any of the 5 Principles assessed.

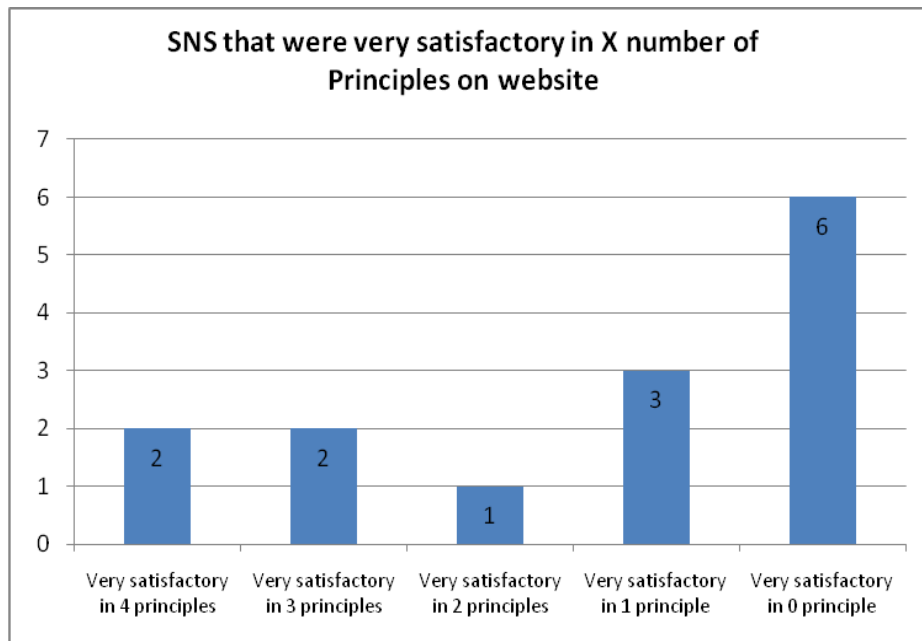


Fig. 4 SNS that were very satisfactory in X number of Principles on website

The analysis of the self-declarations of the 14 Social Networking Sites evaluated shows that Principle 7 “Assess the means for reviewing illegal or prohibited content/conduct” and Principle 5 “Respond to notifications of illegal content or conduct” were the best assessed in terms of their self-declarations (See Fig. 5). Because of ethical reasons these 2 principles were not tested on their respective websites.

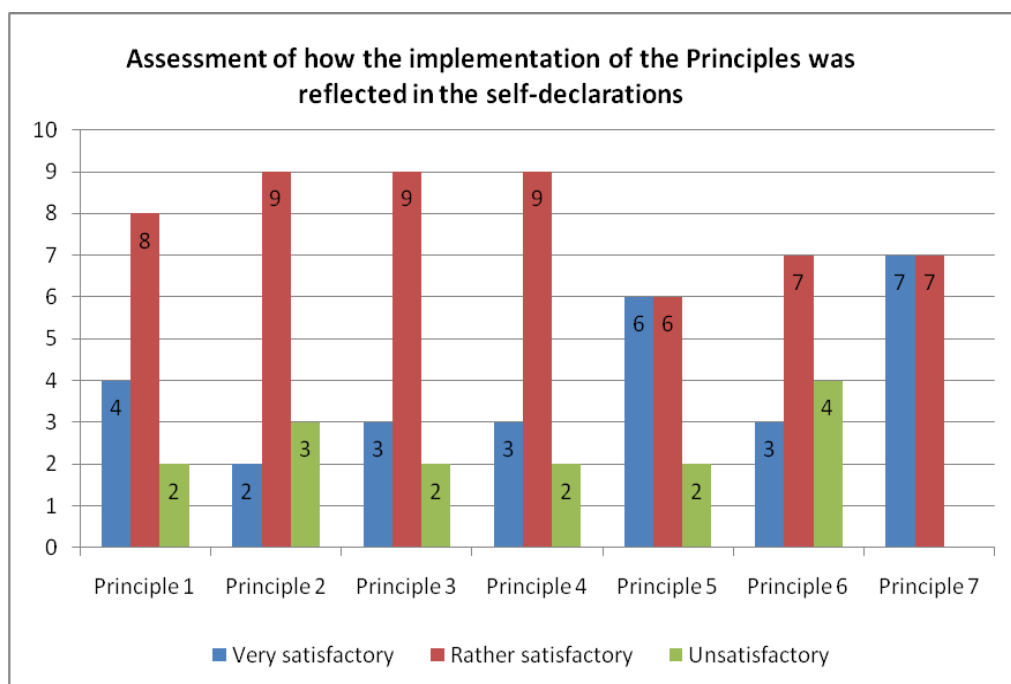


Fig. 5 Assessment of how the implementation of the Principles was reflected in the self-declarations

MAIN FINDINGS IN RELATION TO THE IMPLEMENTATION OF THE INDIVIDUAL SELF-DECLARATIONS ON THEIR RESPECTIVE WEBSITES

As part of this assessment, all Principles, except 5 and 7⁸, were tested through a wide range of tasks that national researchers had to perform on the websites of the 14 SNS being evaluated in this Phase. In terms of the implementation of the individual commitments expressed in the self-declarations on the SNS websites, Principles 1 “Raise awareness” and Principle 4 “Easy mechanisms for reporting violations” were the best assessed. Figure 6 below illustrates the general assessment of Principles 1, 2, 3, 4 and 6 on the SNS websites according to the respective individual self-declarations.

In relation to Principle 1, 5 services were assessed as *very satisfactory* on their implementation of their individual commitments on their websites while 9 services were evaluated as *rather satisfactory*. No service was evaluated as *unsatisfactory* regarding this Principle. Indeed, all the SNSs evaluated provided safety information, guidance and/or educational materials for minors, parents, teachers and or carers and most of the times this information was age-appropriate and easy-to-understand. However, as the tests demonstrated, this information was not always easy to find.

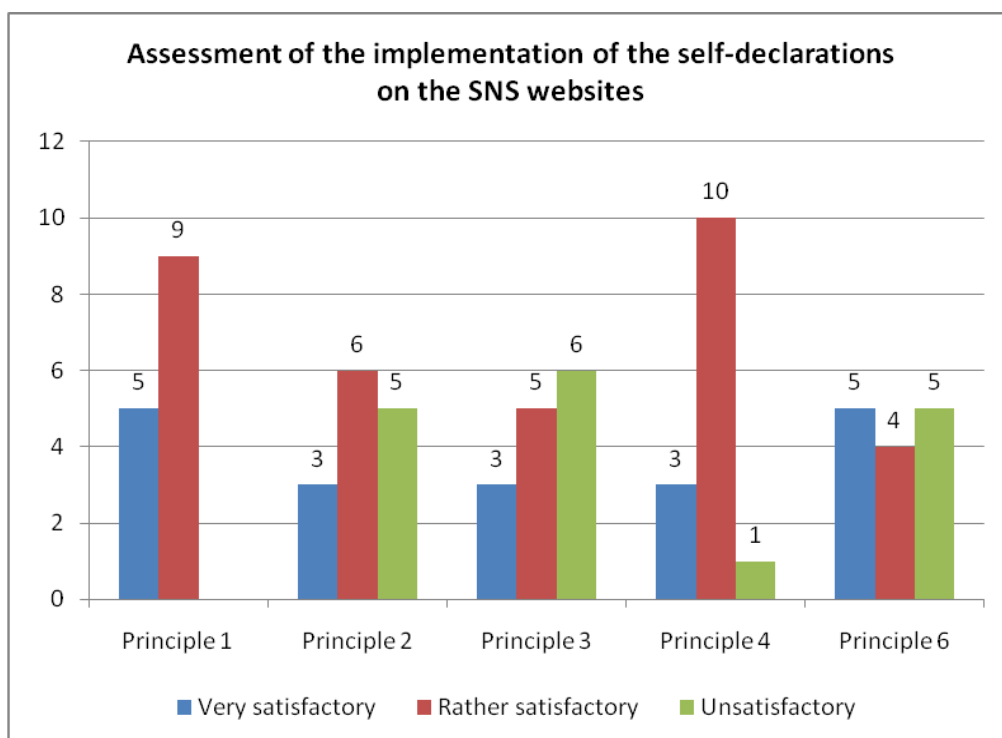


Fig. 6 Assessment of the implementation of the self-declarations on the SNS websites

The next best assessed is Principle 4, 3 SNS providers were assessed as *very satisfactory*, 10 as *rather satisfactory* and only 1 as *unsatisfactory*. Services that were assessed as *very satisfactory* on their website provided reporting mechanisms that were both user-friendly and effective.

Principle 3 “Empower users” was the least well evaluated with as much as 6 services being assessed as *unsatisfactory*, 5 as *rather satisfactory* and only 3 as *very satisfactory*. Arguably, the main weakness in the implementation of this Principle is that in most of the SNS tested the profiles of minors could either be

⁸ Both Principles 5 and 7 deal with the reporting and the handling of illegal content and conduct. Because of ethical reasons none of these Principles was tested on the SNS websites.

accessed by users beyond the minors' accepted list of contacts and/or minors could be contacted (e.g. via personal messages) by (non) users beyond their approved contacts list.

The following sections summarise the main findings by Principle across the 14 SNS tested.

Principle 1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner

Principle 1 states that Social Networks should "*Raise awareness of safety and education messages and acceptable use policies to users, parents, teachers and careers in prominent, clear and age-appropriate manner*". The principle is operationalized into five specific recommendations ("Safer Social Networking Principles for the EU," 2009: 6):

- Providers should create clear, targeted guidance and educational materials designed to give children and young people the tools, knowledge and skills to navigate their services safely.
- These messages should be presented in a prominent, accessible, easy-to-understand and practical format.
- Service providers should provide clear information about what constitutes inappropriate behaviour. This information should be easily accessible and include information about the consequences of breaching these terms. Providers should explore other ways to communicate this information outside the terms of Service.
- Providers should offer parents targeted links, educational materials and other technical controls as appropriate with the aim of fostering dialogue, trust and involvement between parents and children about responsible and safer internet use.
- SNS providers should ensure that such materials also empower teachers to help children use SNSs safely and responsibly.

In general terms, the assessment of Principle 1 is quite positive on the website and very consistent with the providers' commitments in their self-declarations as observed in Figure 7. Here, we can see that 4 of the SNS were evaluated as *very satisfactory* in their self-declarations compared to 5 *very satisfactorily* assessed on their websites. In the self-declaration 8 services were evaluated as *rather satisfactory* while 9 services were evaluated as *rather satisfactory* on their websites. In the self-declarations only 1 service was evaluated as *unsatisfactory* while none was *unsatisfactory* on the website. The 5 sites that were evaluated as *very satisfactory* fulfilled their commitment expressed in their self-declaration including in their websites safety information, guidance and/or educational materials specifically targeted at children, their parents or guardians and teachers. Still, only in 3 of these 5 websites (evaluated as very satisfactory) the Terms of use or community guidelines were also especially adapted to younger users. In these services this information was easy to find and clear for minors to understand. These sites also presented this information in age-appropriate formats including short and clear pieces of text and/or supporting audio-visual materials such as videos created by the own members of the community or comics illustrating how to protect oneself from eventual online risks and on how to use the service properly according to the "house rules".

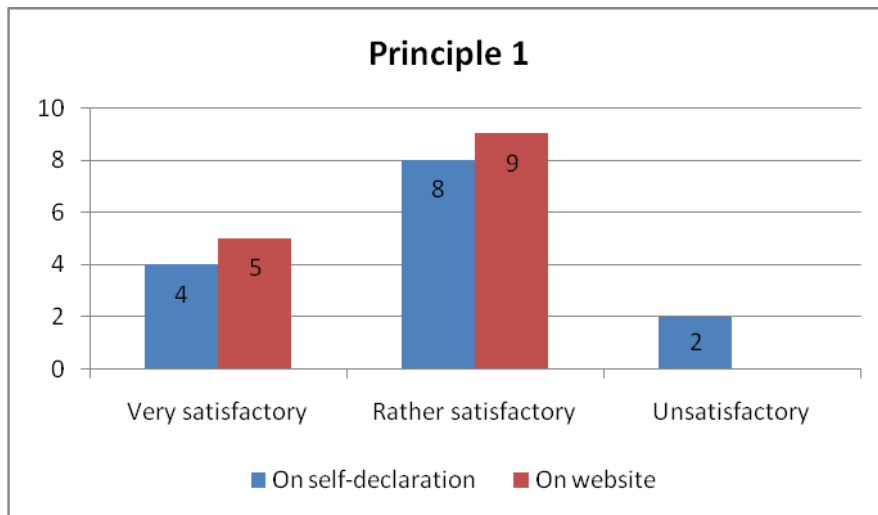


Fig. 7 Assessment of Principle 1 in self-declaration vs. website

WHAT TYPE OF SAFETY INFORMATION/MATERIALS ARE AVAILABLE?

13 of the 14 services provide some type of safety information, guidance and/or educational materials on their websites specifically targeted at children (See Fig. 8). Only in one of the services the information provided was not specifically targeted at minors, however general safety information and tips were available on the site. The safety information mainly includes topics such as bullying, divulging one's personal information, reputation management, hate speech and pornographic and/or sexual content. Information on other topics such as self-harm (suicide, anorexia, bulimia, etc.) or conduct-related risks is rare. Safety information for parents, teachers and/or carers is provided in the 14 services tested (See Fig.9).

Regarding the format of the safety information available for minors, in the majority of the cases this information was presented in the form of texts only. In 6 out of 14 cases, this information was also provided via other formats including, among others, videos, audio fragments and/or comics.

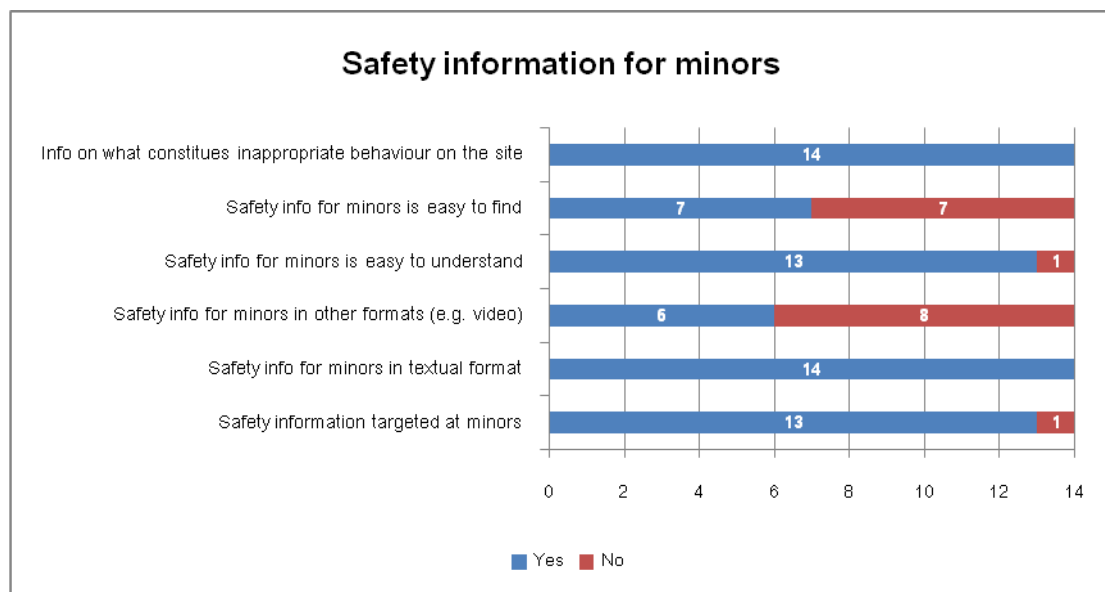


Fig. 8 Availability of safety information for minors

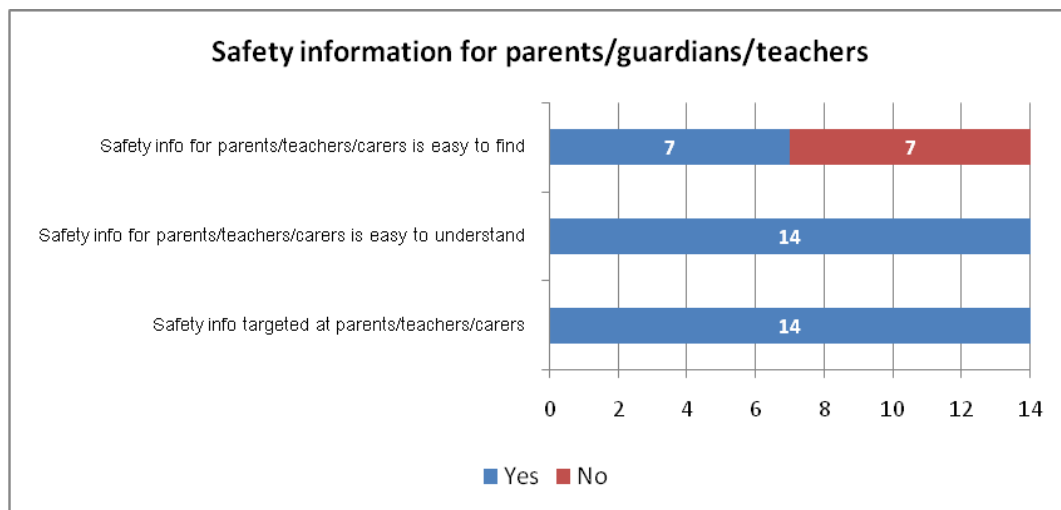


Fig. 9 Availability of Safety information for parents, guardians and/or teachers

IS THE SAFETY INFORMATION PROVIDED BY THE SNS EASY TO FIND AND TO UNDERSTAND?

In all but one service (which did not provide safety information specially targeted at children, but general safety information targeted at parents and carers), was the information related to safety quite clear and age-appropriate for minors (above the minimum age required by the SNS). The safety information and tips for teachers and parents were always clear and easy-to-understand. However, a less positive aspect related to Principle 1 is the fact that the safety information available is not always easy to find. This is both in the case of information targeted at minors as information targeted at adults. Indeed, only in 7 of the 14 SNS evaluated was safety information for minors easy to find and prominently placed on the websites.

IS IT CLEAR TO USERS WHAT CONSTITUTES INAPPROPRIATE BEHAVIOUR ON THE SNS?

All the SNS provide Terms of Use, Community guidelines and/or House rules. In many cases, though, this information is either difficult to access and/or difficult to understand, especially for younger audiences because this information is usually presented through long texts containing considerable legal and/or technical terms which may be difficult for minors to understand.

All the SNS evaluated include explicit information on what constitutes inappropriate or forbidden behaviour on their services (e.g. uploading illegal or inappropriate materials such as pornography, bullying other users, exploiting minors in any way, etc.) and the consequences thereof (e.g. being reprimanded, having one's account suspended, temporarily cancelled or deleted, or even being reported to the corresponding legal authorities depending on the seriousness of the offence committed). This information, however, is in many cases either difficult to understand by minors and/or difficult to find on the website. Indeed, only in 4 services the Terms of Use (meant for the general public) are easy to understand, even for minors. In 6 of the 14 SNS tested an additional, adapted, child-friendly version of the Terms of Use or Code of Conduct is provided (apart from the general Terms of Use). This adapted version of the Terms is presented in either textual and/or audio-visual format which clearly illustrates forbidden behaviour on the site and the possible consequences of such inappropriate behaviours. In sum, **9 sites provided either Terms of Use which were easy for minors to understand and/or an additional child-friendly, adapted version of the Terms of Use or Code of Conduct. Still, only in 6 sites were the Terms of Use easy to find.** One site provided both an easy-to-understand version of the terms of Use and an additional, adapted, child-friendly version of such Terms.

EXAMPLES OF BEST PRACTICE UNDER PRINCIPLE 1:

Some examples of Best Practice regarding the implementation of the company's commitment in their self-declaration on their website are Bebo, Facebook, Myspace, Nasza Klasa, One, Rate and SchuelerVZ. All these services provide safety information for children, parents and carers that are both easy to find and to understand.

Principle 2: Work towards ensuring that services are age-appropriate for the intended audience

Principle 2 states that Social Networks should “work towards ensuring that services are age-appropriate for the intended audience”. In order to assess the implementation of such services, a differentiation has been made between 1) restrictions meant to ensure that those below the intended minimum age of the service cannot register (sign-up restrictions), and 2) restrictions aimed at ensuring age appropriate services when the user is already registered and a member of a social networking site.

According to the self-declaration, Principle 2 was evaluated as *very satisfactory* on 2 SNS, *rather satisfactory* on 9 and as *unsatisfactory* in 3 of the 14 services. On the websites, Principle 2 was assessed as *very satisfactory* in 3 services, as *rather satisfactory* in 6 services and as *unsatisfactory* in 5 services (See Fig. 10). The best evaluated services were those where their commitment to deny access to underage users was in place, where mechanisms to attempt to prevent re-registration, e.g. employing cookies or allowing parents to have their IP addresses blocked, as expressed in their self-declarations, were effectively in place and where minors were not confronted with any type of inappropriate content including advertising (in the case of SNS that referred to advertising in their self-declarations).

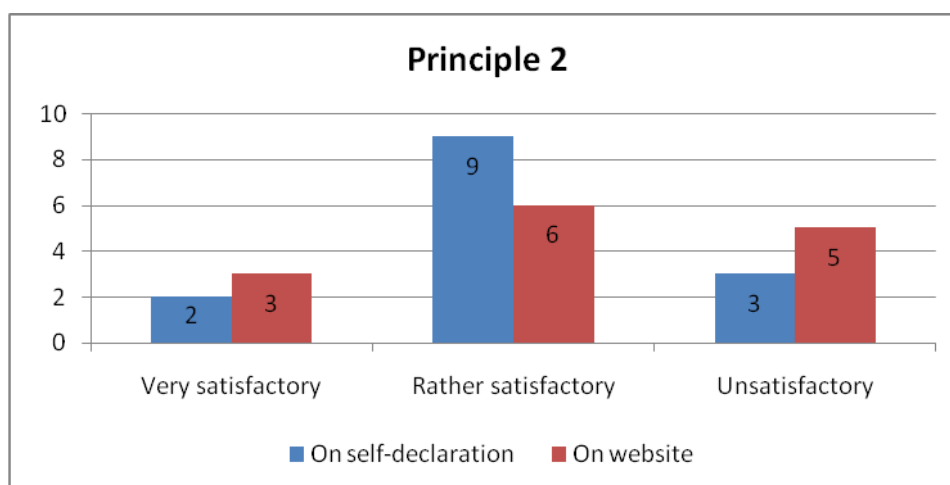


Fig. 10 Assessment of Principle 2 in self-declaration vs. website

ARE THE SERVICES AGE-RESTRICTED?

11 of the 14 SNS have set up a minimum age requirement in order for users to be able to sign up to their services. In 4 of these services the minimum age requirement is 12, in 5 the minimum age requirement is 13 and in 2 it is 14. In 3 SNS no minimum age registration applies. According to their self-declarations, in 2 of these non age-restricted services parental consent is required from children younger than 16 and 18, respectively in order to sign-up on the site.

WHAT HAPPENS IF AN UNDER-AGE USER TRIES TO SIGN UP?

In order to test this, national researchers attempted to create a profile of a 9-year old child in the service they were testing. In all cases, new users were demanded to provide at least some basic personal information including their (real) date of birth. Researchers were instructed to create a profile of a 9-year old by providing the child's "real" date of birth at registration. The results of this test showed that 9 of the 11 SNS intended to be age-restricted effectively do not allow sign-up by underage users if they provide their real age. 2 of the intended age-restricted services immediately allowed underage users to register on their services after this first attempt. In the 3 other services which are not age-restricted this is not applicable. Self-declaration of age was, thus, the most common mechanism employed by service providers in order to verify a user's age.

9 of the 11 SNS that are age-restricted state in their self-declaration that they employ some mechanism to delete underage users from their websites such as analysis of friends' connections to identify suspicious underage users, user-generated reports, etc. 2 SNSs do not explicitly state in their self-declaration what mechanisms they employ to delete underage users from their services. Within the SNS that are age-restricted the most common age verification mechanism is self-declaration of age.

IS IT POSSIBLE FOR MINORS TO RE-REGISTER ON THE SITE ONCE THEY HAVE BEEN DENIED ACCESS FOR BEING UNDER AGE?

If signing up as a 9-year-old child had failed researchers were instructed to attempt to re-register on the site but this time they had to indicate that their age was just above the minimum age required by the SNS. Researchers were also instructed not to erase any cookies nor modify any of their previous settings. Testing on the websites revealed that in all the SNS intended to be age-restricted users could eventually register on the site by changing their initial age to one just above the minimum age required by the SNS. In 2 services, this process was a little bit more difficult because, as mentioned in their self-declarations, cookies had been installed to avoid re-registration. However even in these cases it was possible for a minor to sign up once the cookies were removed (e.g. simply closing the browser and opening it again removed the cookies in those cases where cookies had been installed) and by changing the date of birth to one just above the minimum age required.

ARE MINORS CONFRONTED WITH ANY TYPE OF INAPPROPRIATE CONTENT AND/OR SERVICES?

According to the self-declarations, 10 SNS restrict access to certain types of content and/or services for minors. 4 services do not refer to this in their self-declarations. On the website, 4 services explicitly restricted access to certain types of content and/or sections to minors. In the majority of the services tested, however, the information and services provided by the SNS were appropriate for all audiences. Nevertheless, in 3 cases it was possible for minors to see some inappropriate content, for instance discussions about sexual positions in a supposedly "adult only" forum or highly sexy pictures and some inappropriate comments about them on some adult profiles displayed on the homepage of some of the services and publicly available to all users.

IS ADVERTISING AGE-APPROPRIATE?

Although advertising is not included in the Safer Social Networking Principles for the EU, 10 of the 14 SNSs explicitly refer to advertising in their self-declarations. These service providers indicate that advertising on the services they run is always age-appropriate and that children are not confronted with any adult-oriented advertising such as alcohol brands or cigarettes on their websites. 4 services do not refer to advertising in their self-declarations. Of the 10 SNS tested regarding advertising only in 2 some advertising that could be considered as not appropriate for minors was found. In one of them pages dedicated to alcohol brands could be accessed by minors. In the other one there was an ad that appeared to be for a celebrity gossip blog (Rihanna or Fake?). However, when clicking on the ad it opened a video chat application called Rounds. This application opened the tester's webcam and prompted the tester to "call a friend or meet someone new". When the option "meet-someone new" was clicked the tester was informed that it was necessary to "have at least 100 friends on the SNS to join a random Round".

ARE WORD FILTERS EFFICIENT TO DETECT INAPPROPRIATE LANGUAGE OR CONTENT?

Two service providers indicated in their self-declarations that they employed word filters to limit the exposure of minors to inappropriate language or content, therefore these functionalities were also tested. During the testing, a message containing swear words was posted on the minor's profile (created for the testing purposes) of these two SNS websites. Also two of the pictures - published in those profiles - were commented with swear words. In one of the sites tested, these offensive comments were not spotted by the system when the filter was set to "off" (the default filter option). However, when the filter is set to "on", an attempt to post a new comment containing swear words was unsuccessful. A system message was displayed with a request to correct the inappropriate message. A further attempt to post an offensive comment – without removing the swear words - resulted in blocking the offending user. Still, it was possible to put offensive comments under pictures in the minor's profile (in the gallery). In the other SNS tested the word filter proved to be totally ineffective.

EXAMPLES OF BEST PRACTICE UNDER PRINCIPLE 2:

Bebo, Facebook, Giovani, IRC-Galleria, Myspace, Netlog, SchuelerVZ, Tuenti and Zap stated in their self-declarations that they denied access to under age users to their sites and they did so, on their websites.

Arto, Bebo, Giovani, Hyves, IRC-Galleria, Myspace, One, Rate and Zap are examples of best practice of services that committed themselves to not displaying inappropriate advertising to minors and who effectively did so, on their websites.

Principle 3: Empower users through tools and technology

The third principle "*Empower users through tools and technology*" refers to the tools and technologies employed to assist children and young users in managing their experience of the service. According to the "Safer Social Networking Principles for the EU" (2009: 7-8) such tools include:

- Taking steps to ensure that private profiles of users registered as under the age of 18 are not searchable
- Set private profiles for users below 18 to private by default
- Make private profiles viewable only to "friends"/people on the user's contact list
- Give users control over who can access their full profile
- Give users control over who can post comments and content on their profile and the possibility to delete messages and other content
- Give users the option to pre-moderate comments from other users before they are published on their profile
- Provide easy-to-use tools for reporting inappropriate contact or content from other users⁹
- Educate parents about available tools.

Principle 3 was assessed as *very satisfactory* in 3 individual self-declarations, as *rather satisfactory* in 9 and as *unsatisfactory* in 2. On the websites, Principle 3 was assessed as *very satisfactory* on the same 3 services that were very satisfactory in their self-declarations, as *rather satisfactory* in 5 services and as *unsatisfactory* in almost half of the services tested (6 in total), what reveals some considerable inconsistencies between some of the companies' commitment regarding this Principle and the actual implementation of their commitments on the services they run (See fig. 11).

⁹ For elaboration on the implementation of this point, please refer to Principle no.4 and Principle no.5.

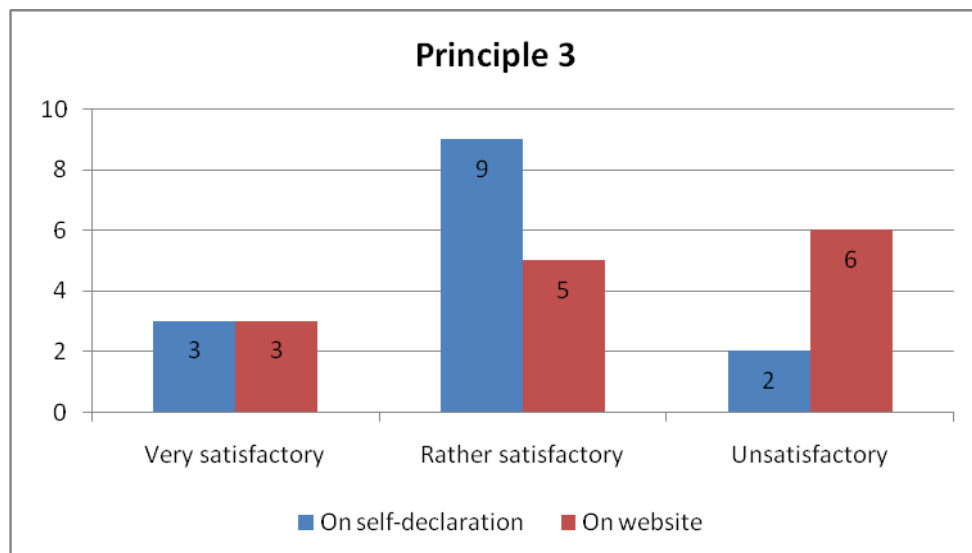


Fig. 11 Assessment of Principle 3 in self-declaration vs. website

In 2 of the 3 services that were best evaluated on their websites regarding Principle 3, the personal information of minors was both only visible to friends and minors could be contacted by friends only. In the third invitation-only service, some limited, but potentially identifiable information from the minor was displayed to the minor's approved contacts list, but also to their friends. Nevertheless, "friends of friends" (and other non-friends) could not get in touch with the minor.

WHAT TYPE OF INFORMATION IS VISIBLE TO USERS BEYOND THE MINOR'S APPROVED LIST OF CONTACTS?

11 self-declarations state that the "default" profiles of minors can only be viewed by friends and 9 services explicitly state that very little or no information from the minors is displayed in their profiles to "non-friends". The tests on the website, however, showed that in 11 services a considerable amount of personal information was displayed to users beyond the minor's approved contacts list (including non-friends but also friends of friends who are not directly linked to the minor). In some cases, pictures, the full name of the minor, the name and sometimes the address of the school they attend, comments posted on the minor's profiles, the minor's online status, interests, hobbies, etc were displayed to either "friends of friends" and/or non-friends. **Only 2 of the SNS assessed make minors' personal information visible only to their friends by default, i.e. they display very little and non-identifiable information from the minor to (non) users beyond the minor's approved contact list, while 1 invitation-only service displays, by default, very little, but potentially identifiable information from the minor to friends and "friends of friends", but not beyond.** Compared to last years' results, no improvement was observed regarding the implementation of this measure.

WHO CAN GET IN TOUCH WITH MINORS VIA THE SNS?

Testing on the website also revealed that, by default, only in 4 services minors can be contacted by friends only. In the other 10 services minors could be contacted either by "friends of friends" (9 services) and/or by non-friend users of the service (9 services) via personal messages and/or by writing comments on their public profiles (e.g. in photos, in blogs, etc.).

CAN PROFILES OF MINORS BE FOUND BY USERS BEYOND THE MINOR'S APPROVED LIST OF CONTACTS?

In 12 of the 14 services tested profiles of minors could not be found via external search engines such as Google, Bing or Yahoo! Last year's assessment revealed that only 6 of the 14 services tested in this phase made it impossible for the private profiles of minors to be found through external search engines, which shows a

great improvement in terms of the (un)searchability of minor's profiles. In most services (11 in total), though, the profiles of minors could be found by other non-friend users via the internal search engine of the SNS.

CAN USERS CONTROL WHAT IS POSTED TO THEIR PROFILES?

Pre-moderate comments or content before being published in one's profile was only possible on 3 services. Deleting unwanted comments was possible in 11 of the 14 services. In the other 3 cases it was either not possible for users to delete unwanted comments/content or users had to pay a certain amount of money in order to be able to do so. Only in 7 of the 14 websites tested only friends were allowed to post comments on the minors' profile. In the other 7 SNSs, by default, non-friends could also post comments on minors' profiles. In all the services users could block other users and reject friends' requests.

PAYING SOME MONEY IS NECESSARY TO HAVE ACCESS TO CERTAIN FUNCTIONALITIES

In two of the SNS websites tested some functionalities were restricted unless users (including minors) paid a small amount of money. In one of these sites, for instance, deleting comments or ratings in one's pictures was only possible after paying a small amount of money. Several other services were available only in case users paid, e.g. uploading, changing and editing photos; rating the photos with the highest score; the amount of time it takes for the moderators to process one's photos, etc. The cost of these services depends on the way one pays for them e.g. through e-bank (approx. 0.11 EUR), via SMS service provider (approx. 0.19 euro), by making a phone call to a paid service (approx. 0.20 euro) or by means of a special card (approx. 0.14 euro). Also, changing one's birth date (previously provided in the registration) was possible to do by paying the equivalent to 0.33 euro.

In the second SNS service tested, when searched inside the SNS, "not friends" could not get immediate access to a user's personal profile because the internal search engine only offers, by default, the option to "search among friends". However, there is an "alternative" paid search option called "search for all" that allows registered users (who pay approx. 0.58 euro) to search for as many contacts as they wish during a 30 day period. This "search for all" engine enables registered users, even adult strangers, to see the whole minor's profile (which by default includes personal information such as the minor's telephone number) plus photo albums and messages in the minor's forum. However, if the minor has set additional privacy settings to protect their personal information, then this information is kept as "private" even for users who have paid to "search for all".

EXAMPLES OF BEST PRACTICE UNDER PRINCIPLE 3:

Bebo and MySpace and are the only services that make minors' personal information visible only to their approved list of contacts by default (i.e. they display very little and non-identifiable information from the minor to (non) users beyond the minor's approved contact list).

In Bebo, Myspace, Netlog and SchuelerVZ minors cannot be contacted by anybody beyond the minor's approved contact list.

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service

In order to successfully implement principle 4 "Provide easy-to-use mechanisms to report conduct or content that violates the terms of service" on their services,

- Providers should provide a mechanism for reporting inappropriate content, contact or behavior as outlined in their Terms of Service, acceptable use policy and/or community guidelines. These mechanisms should be easily accessible to users at all times and the procedure should be easily understandable and age-appropriate.
- Reports should be acknowledged and acted upon expeditiously.

- Users should be provided with the information they need to make an effective report and, where appropriate, an indication of how reports are typically handled.

According to the self-declaration only 3 services were assessed as very satisfactory, 9 as rather satisfactory and 2 as unsatisfactory. On the website, 3 services were assessed as very satisfactory as well, 10 as rather satisfactory and only 1 was unsatisfactory (See Fig. 12).

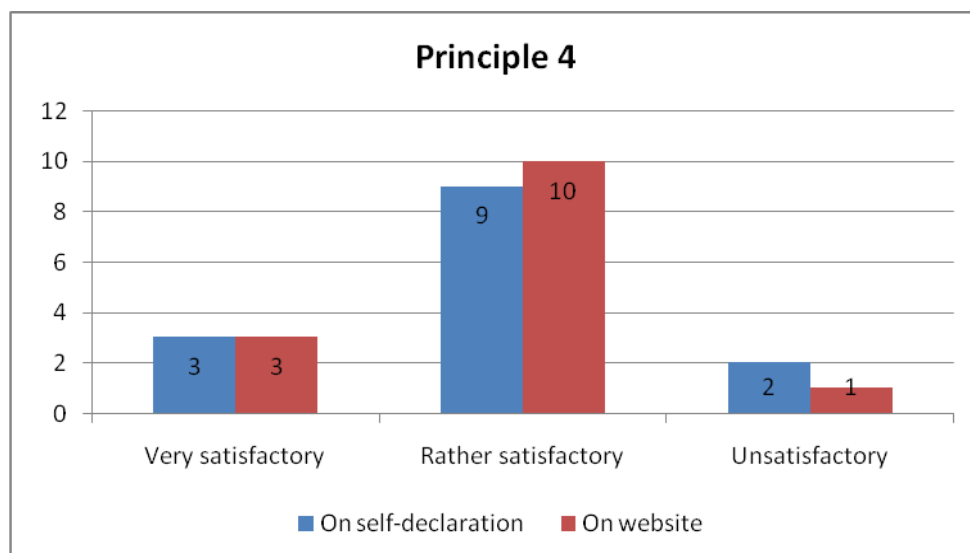


Fig. 12 Assessment of Principle 4 in self-declaration vs. website

WHAT REPORTING MECHANISMS DO SNS OFFER TO REPORT INAPPROPRIATE CONTENT OR CONDUCT ON THEIR SERVICES?

All the 14 services tested provided at least some mechanism for reporting inappropriate content or contact on their website including a general report button in 13 of the 14 SNS tested. 11 services provided dedicated report buttons placed next to user-generated content such as pictures, videos or comments. Report forms were available in 13 services and reporting via e-mail was possible in 7 services. Only one of the services did not provide any dedicated mechanism to report abuse, but reporting could still be done by sending an e-mail to the website's administration.

ARE REPORTING MECHANISMS AGE-APPROPRIATE, USER FRIENDLY AND ACESIBLE AT ALL TIMES?

As part of this study, a (fake) 15-year old girl user reported that she had been bullied on this SNS. A realistic bullying situation was set up between the (fictitious) owners of profiles that were created for this assessment. The scenario consisted of one minor being bullied by two other minor users who posted nasty comments on the profile of the "victim" and who uploaded some hurtful pictures. As the "victim" could not cope with the nasty comments put on her profile and the embarrassing pictures, she contacted the provider by sending a message, if at all possible. This message was carefully designed and worded to be a general request but at the same time a cry for help. On a few services it was not possible to send a general request, asking for help, but rather users were asked to fill in a pre-defined form. In these cases the national researcher was asked to fill-in the pre-defined form and, if possible, add a text that resembled the original message the most.

Testing on the website revealed that 12 out of 14 of the services assessed provide age-appropriate reporting mechanisms, 11 services provide user-friendly mechanisms and 12 of the reporting mechanisms were overall assessed as easily accessible. On 11 of the 14 services tested, the reporting mechanisms were at all times available. 12 services provided users with supporting information in order to make an effective report.

HOW ARE USERS REPORTS DEALT WITH?

Only in 7 services reports were acknowledged by the provider indicating that the reports were being handled. One of these services (tested in two languages) only sent an acknowledgement in one of the language versions being tested, but not in the other one. **In 10 services the reports were responded. However, in one of these services (tested in two language versions) the report was responded in only one of the versions tested. Only in 7 cases were these responses prompt taking between a few minutes to a few hours, but never more than a day to reach the “victim”.** In one case an answer was received within 26 hours and In 3 cases the responses took between 4 and 10 days to arrive. In one of the websites tested in two languages a reply was obtained within 1 day in one version of the site, but no reply was received in the other language version tested. In the other 2 websites tested in two languages the results were consistent in both language versions. The pie chart below (Fig. 13) illustrates the response time to users who asked the Social Networking Services for help. This chart shows the response time of all the individual tests carried out including the three websites that were tested in two different language versions¹⁰. Therefore, it shows the results of the 17 tests carried out in the 14 SNS tested.

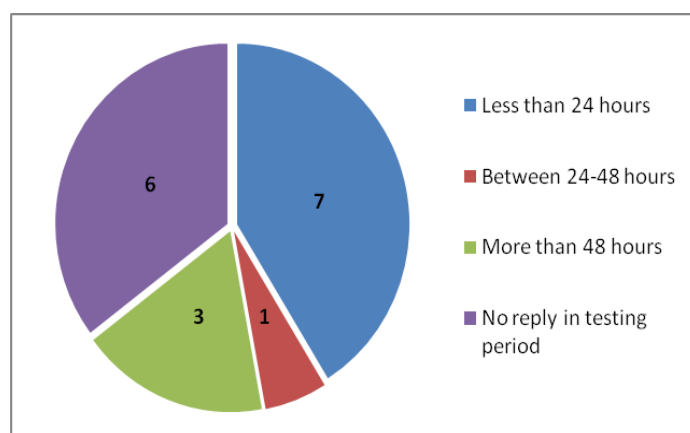


Fig. 13 Response time to users asking the Social Networking Services for help

Apart from the fact that the provider sent a reply to the (reporting) minor, attention was also paid to what actually happened with the offending content (bullying pictures and nasty comments and/or messages created for this test) posted on the profile of the “victim”. Only in 6 cases was the inappropriate reported content removed from the site and in only 4 SNS was some kind of action taken against the “bullies” (created for this test) such as deleting their account or warning the offenders that this type of behaviour was not allowed on the SNS and that future offenses could end up with their accounts being terminated.

As these results show, the ways the different service providers respond to the same reported (bullying) situation varies considerably. Concretely speaking, some SNS sent standard replies while others sent personalised ones. Others simply did not send any reply at all. Some SNS removed the offending content while others did not, however some of the ones who did not, provided personalised answers (even in 1 day or less) to the “bullied” user explaining in detail how to remove the offending content herself, how to block offenders, etc.

In other cases, some SNS took more radical measures, for instance one SNS immediately deleted the account of the “bully”. However, “the bully” was not informed that this would happen. Still, when “the bully” noticed his account had been deleted he could re-register on the site using exactly the same e-mail address and the same personal information he had used as “bully”. In other cases, only some parts of the bullying content used

¹⁰ The total amount of tests carried out was 17, i.e. 14 tests performed on each SNS plus 3 additional tests carried out on those SNS that were tested in two language versions.

during the test was deleted, for instance only the “bullying” pictures were deleted, but not the offending comments posted on the victim’s profile or vice versa.

Considering the variety of approaches employed by all the 14 service providers tested, the following general criteria was applied in order to decide how satisfactory each service was in implementing their own commitments on their website, namely 1) the user-friendliness of the reporting mechanism and 2) the effectiveness with which the SNS responded to the report sent by the “bullied victim”. If both criteria were met the SNS was evaluated as “very satisfactory”. If only one of those two criteria was met, the SNS was assessed as “rather satisfactory”. If none of the criteria was met, the SNS was assessed as “unsatisfactory”. All things considered, the majority of the SNS tested (10 in total) were evaluated as “rather satisfactory” because most of them only met one of the criteria successfully). Only one service did not meet any of the 2 criteria.

All in all, these results show considerable improvement as compared to last year’s assessment that showed that only in 5 out of the 14 tests performed websites sent replies to reports asking for help. This year in 10 of the 14 SNS assessed (i.e. in 11 out of 17 tests performed) an answer was received.

EXAMPLES OF BEST PRACTICE UNDER PRINCIPLE 4:

Arto, IRC-Galleria, Nasza-Klasa and Zap are examples of best practice where both user reports were responded to quickly and the offending content was removed from the site.

Principle 5: Respond to notifications of illegal content or conduct

Because of ethical reasons Principle 5 was not tested on the website. Thus, this section only summarizes the main findings related to the analysis of the 14 self-declaration forms.

Principle 5 states that “upon receipt of notification of alleged illegal content or conduct¹¹ providers should have effective processes in place to expeditiously review and remove offending content.” Principle 5 also states that “service providers should have in place arrangements to share reports of illegal content or conduct with the relevant law enforcement bodies and/or hotlines” (Safer Social Networking Principles for the EU, 2009: 8). While efficient processes for handling such notifications should be in place, it is evident from the analysis of the self-declarations that the nature of the measures implemented by each service varies according to the national legislation and jurisdiction where the services operate. Thus, only a very overall picture regarding this Principle can be presented here.

Principle 5 was evaluated as *very satisfactory* in 6 services, *rather satisfactory* in 6 services and *unsatisfactory* in 2 services in relation to the self-declaration.

In their self-declaration 10 of the 14 service providers claim that they have effective processes in place to review and remove offending content from their websites and that these processes are expeditious. The other 4 services analysed do not explicitly refer to this in their self-declarations.

All the service providers assessed claim to share reports of illegal content with the corresponding law enforcement bodies while only 5 of the websites analysed state in their self-declarations that they provide links on their websites to other local agencies and organisations in order to support the reporting of illegal content or conduct on their services. 9 services do not refer to this in their self-declaration.

¹¹ In the context of child protection, illegal content and conduct in this context refers to child abuse images and grooming respectively.

Principle 6: Enable and encourage users to employ a safe approach to personal information and privacy

Principle 6 requires that the Social Networks “Enable and encourage users to employ a safe approach to personal information and privacy”. Specifically providers should:

- Provide a range of privacy setting options with supporting information that encourages users to make informed decisions about the information they post online. These options should be prominent in the user experience and accessible at all times.
- Consider the implications of automatically mapping information provided during registration onto profiles, make users aware when this happens, and should consider allowing them to edit and make public/private that information where appropriate.
- Users should be able to view their privacy status or settings at any given time. Where possible, the user’s privacy settings should be visible at all times.

According to their self-declaration, Principle 6 was evaluated as *very satisfactory* in 3 services, *rather satisfactory* in 7 and *unsatisfactory* in 4. In relation to the implementation of the self-declaration on the respective websites, Principle 6 was assessed as *very satisfactory* in 5 services, *rather satisfactory* in 4 and *unsatisfactory* in 5 of the services analysed (See Fig. 14).

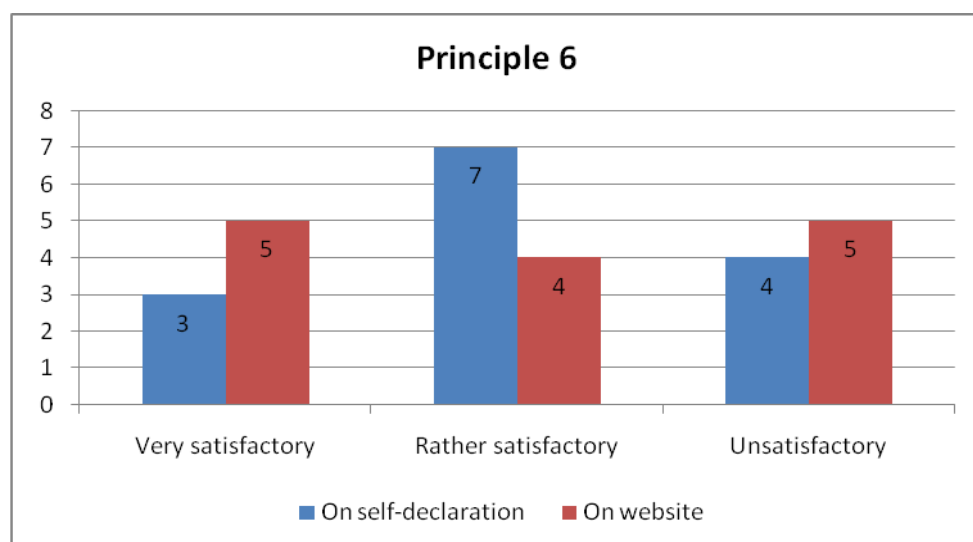


Fig. 14 Assessment of Principle 6 in self-declaration vs. website

DO SNS OFFER ENOUGH PRIVACY SETTING OPTIONS TO USERS? ARE THESE SETTINGS USER-FRIENDLY AND ACCESSIBLE AT ALL TIMES?

All the 14 services offer their users (included minors) a range of privacy settings so that they can manage their experience on the SNS websites. The range and modality of privacy options vary, however, from services to service. In some services privacy options are limited allowing users only to select from a set of pre-defined privacy settings so that users can only choose to either display *all* their information and user-generated content to *everyone*, to *friends only* or to *no one*. Other services offer a wider range of options including the possibility to display some sections of one’s profile (as opposed to the whole profile) to pre-defined groups (e.g. “friends”, “friends of friends” or “everyone”), but only 3 services offer *granular* settings allowing users to decide which

individual piece(s) of content to share with which specific user or groups of users allowing users to have complete privacy control over every piece of content they post online.

Privacy settings options are accompanied by supporting information in 11 of the 14 services assessed. This supporting information helps users make informed decisions regarding their privacy settings options and/or supports users by instructing them on how to change their privacy settings. The supporting information was mainly textual, but in a few cases other formats were provided such as video tutorials or contextual information, for instance in the form of pop-ups, which appeared right at the moment of uploading information onto the profile.

Privacy settings are user-friendly in 13 of the 14 services analysed. In 12 services they are also accessible at all times.

IS INFORMATION PROVIDED BY MINORS DURING REGISTRATION AUTOMATICALLY MAPPED INTO THEIR PROFILES?

In 13 of the 14 services analysed (some of) the information provided by minors during registration is automatically mapped into the user's profiles. However, only in 3 cases users were made aware that this would happen. Still, in all the services that automatically map information into the user's profiles it was possible at a later stage to make private or public this information if users wished to.

IS IT EASY TO DELETE ONE'S PROFILE ON THE SNS?

Deleting a profile was easy in all the SNS that provided this option (11 of the 14 analysed). In 3 cases it was only possible to deactivate one's profile, but not completely delete it. When deleting/deactivating one's profile 8 services clearly state what personal information they retain, but only 4 services explicitly informed users what would happen to their personal information once their profiles were deleted.

EXAMPLES OF BEST PRACTICE UNDER PRINCIPLE 6:

Bebo, Facebook and Myspace are best practice examples of websites that offer granular privacy settings so that users can have complete control of the content they post online and with whom they want to share it.

Hyves, Myspace and Rate inform users that the information provided during registration will be mapped into their profile.

Principle 7: Assess the means for reviewing illegal or prohibited content/ conduct

As with Principle 5, because Principle 7 was not tested on the website, only the main findings of the analysis of the self-declarations are summarised here.

Principle 7 has to do with the reviewing of illegal or prohibited material on the Social Networking Sites. According to it, the SNS providers should "during the normal course of developing and managing SNSs, assess their service to identify potential risks to children and young people in order to determine appropriate procedures for reviewing reports of images, videos and text that may contain illegal and inappropriate/unacceptable/prohibited content and/or conduct". Such procedures include ("Safer Social Networking Principles of the EU," 2009: 9):

- human and/or automated forms of moderation
- technical tools (e.g. filters) to flag potentially illegal or prohibited content
- community alerts
- user-generated reports

In addition, Principle 7 states that attention should be given to the risk of employing or using human moderators who may be unsuitable for working with children or young people.

According to the analysis of the self-declarations, Principle 7 was assessed as *very satisfactory* in 7 services and as *rather satisfactory* in the other 7 services. The main mechanisms for SNSs to identify potential risks to minors are user-generated reports (available in all the 14 services tested) and the use of automated mechanisms such as employing word filters or photo scanners to identify potential threats to minors (available in 11 of the services).

According to the self-declarations, specially trained personnel reviews inappropriate content in 12 of the services analysed. According to the analysis of the self-declarations, human moderators are employed in 7 of the services analysed, however, just as shown in the results of the first assessment, only in 5 of these services the self-declaration explicitly refers to the steps taken to minimize the risk of employing inappropriate human moderators such as providing them with special training or taking the necessary measures to ensure that they are suitable for the work when they are hired.

GENERAL CONCLUSIONS

Overall, we can observe progress was made in the implementation of the commitments under several Principles.

Principle 1 was better assessed because as opposed to last year's assessment that showed that several websites did not provide safety tips and information specifically targeted towards children and/or teenagers, the 14 services tested in this phase provide at least some type of safety information, guidance and/or educational materials on their websites targeted at children, parents, teachers and/or carers. Regarding the format of the safety information available, the 14 services tested provide this information via written texts while 6 services also provide safety information in other more child-friendly formats such as videos, audio fragments and/or comics. Besides, 9 sites provided either Terms of Use which were easy for minors to understand and/or an additional child-friendly, adapted version of the Terms of Use or Code of Conduct. Nevertheless, only in 6 sites were the Terms of Use easy to find.

As regards Principle 3, progress is observed in terms of the (un)searchability of minor's profiles. This year's assessment revealed that 12 out of the 14 services tested in this phase made it impossible for the private profiles of minors to be found through external search engines (such as Google, Bing or Yahoo!) as opposed to only 6 services last year, which shows an improvement in this area as well.

In relation to Principle 4, this year's assessment also shows considerable improvement. As a matter of fact, 10 SNS responded to the user reports asking for help although in one of the services tested in two languages the report was responded in only one of the versions tested. In 7 cases these responses were prompt (taking between a few minutes to a few hours, but never more than a day to reach the "victim". Last year's assessment revealed that only 5 of the 14 services tested in this phase replied to reports asking for help.

Concerning Principle 6, all the 14 services assessed offer their users (included minors) a range of privacy settings so that they can manage their experience on the SNS websites. The modality of privacy options vary, however, from services to service ranging from limited privacy options where users only have the possibility to share their personal information with *everyone* or with no one to *granular* settings that allow users to decide which individual piece(s) of content to share with which specific users or groups of users. Privacy settings are user-friendly in 13 of the 14 services analysed. In 12 services they are also accessible at all times. Privacy settings options are accompanied by supporting information that helps users make informed decisions regarding their privacy settings options in 11 of the 14 services assessed.

Areas for further improvement include some aspects of Principle 2, 3 and 6. Concerning Principle 2, testing on the websites revealed that in all the SNS intended to be age-restricted users could eventually register on the

site by removing cookies (if they had been installed) and/or by changing the minor's initial age to one above the minimum age required by the SNS.

As regards principle 3 only 2 services make minors' personal information visible only to their friends by default (i.e. they display very little and non-identifiable information from the minor to (non) users beyond the minor's approved contact list) while 1 invitation-only service displays, by default, very little, but potentially identifiable information from the minor to friends and "friends of friends", but not beyond. By contrast, in the other 11 services tested a considerable amount of personal information was displayed to users beyond the minor's approved list of contacts. Compared to last years' results no improvement was observed regarding the implementation of this measure. In relation to the possibility of being contacted beyond one's approved list of contacts, tests revealed that, by default, only in 4 services minors can be contacted by friends only. In the other 10 services minors could be contacted either by friends of friends (9 services) and/or by non-friend users of the service (9 services) via personal messages and/or by writing comments on their public profiles (e.g. in the public profile, in photos, in blogs, etc.).

Regarding Principle 6, in 13 of the 14 services analysed (some of) the information provided by minors during registration was automatically mapped into the user's profiles. However, only in 3 cases users were made aware that this would happen. Still, in all the services that automatically map information into the user's profiles it was possible at a later stage to make private or public this information if users wished to.

REFERENCES

- European Commission. (2009). Safer social networking: The choice of self-regulation. Retrieved 02.08.10, from http://ec.europa.eu/information_society/activities/social_networking/eu_action/selfreg/index_en.htm#self_decl
- Nielsen, J. (1990). How to conduct a heuristic evaluation. Retrieved 03.03.10, from http://www.useit.com/papers/heuristic/heuristic_evaluation.html
- Safer Social Networking Principles for the EU. (2009, February 10th). Retrieved 02.08.10, from http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf
- Staksrud, E. and Lobe, B. (2010). *Evaluation of the implementation of the Safer Social Networking Principles for the EU Part I: General Report*. European Commission Safer Internet Programme, Luxembourg.

ANNEXES

1. Safer Social Networking Principles
2. Testing questionnaire for self-declarations
3. Testing questionnaire for SNS websites
4. Description of participating Social Networking Sites

ANNEX 1. SAFER SOCIAL NETWORKING PRINCIPLES¹²

PRINCIPLE 1: RAISE AWARENESS OF SAFETY EDUCATION MESSAGES AND ACCEPTABLE USE POLICIES TO USERS, PARENTS, TEACHERS AND CARERS IN A PROMINENT, CLEAR AND AGE-APPROPRIATE MANNER

Providers should create clear, targeted guidance and educational materials designed to give children and young people the tools, knowledge and skills to navigate their services safely.

These messages should be presented in a prominent, accessible, easy-to-understand and practical format (e.g. on a help pages and/or in locations where the user makes a decision about how to use the service). Service providers should provide clear information about what constitutes inappropriate behaviour. This information should be easily accessible and include information about the consequences of breaching these terms. Providers should explore other ways to communicate this information outside of the Terms and Conditions.

Parents play a crucial role in their child's internet safety and this role is often best fulfilled when a parent is able to discuss safety issues with their child in an open and informed way. As such, providers should offer parents targeted links, educational materials and other technical controls as appropriate with the aim of fostering dialogue, trust and involvement between parents and children about responsible and safer internet use.

Teachers and other carers also play a crucial role in promoting the safe use of SNSs by children and SNS providers should ensure that such materials also empower teachers to help children use SNSs safely and responsibly.

PRINCIPLE 2: WORK TOWARDS ENSURING THAT SERVICES ARE AGE-APPROPRIATE FOR THE INTENDED AUDIENCE¹³

Providers should, in the normal course of developing and managing SNSs, consider how their service may be associated with potential risks to children and young people, where it is intended for them to use the service^{14,15}. Service providers should seek to limit exposure to potentially inappropriate content and contact. Measures that are available or appropriate to each service will vary in each case¹⁶, but may include for example:

¹² This Annex lists the Principles. For the full text of the agreement, including background information, please refer to http://ec.europa.eu/information_society/activities/social_networking/docs/sn_principles.pdf.

¹³ The intended audience as outlined in each providers' Terms of Service.

¹⁴ The intended audience as outlined in each providers' Terms of Service.

¹⁵ Each SNS is different in terms of target audience, the range of activities users can engage in, the platforms on which they can be consumed and the countries in which they are available. These factors will affect the range and extent of the risks that may affect children and young people when using the site. Assessments of what constitutes inappropriate content for children and young people also varies.

¹⁶ The same combination of factors as listed in the previous footnote will determine what measures are appropriate to address the unique set of challenges and potential risks to users on a particular service. In addition, service providers may also be required to comply with specific local legal requirements pertaining to children's privacy, which may affect how the

- making clear when services are not appropriate for children and young people or where a minimum registration age applies;
- taking steps to identify and delete under-age users from their services;
- taking steps to prevent users from attempting to re-register with a different age if they have previously been rejected for being below the minimum age (if their terms require a minimum age), such as employing cookies;
- working within technical and legal constraints to promote compliance with minimum age requirements;
- promoting the uptake of parental controls which allow parents to manage their children's use of the service;
- providing means for content providers, partners or users to label, rate or age restrict content where appropriate¹⁷;
- only showing certain professionally produced content certain times of the day.

PRINCIPLE 3: EMPOWER USERS THROUGH TOOLS AND TECHNOLOGY

Providers should employ tools and technologies to assist children and young people in managing their experience on their service, particularly with regards to inappropriate or unwanted (but not illegal) content or conduct. Service providers should make an assessment of what measures to implement based on the services being offered and the intended audience.

The measures that can help minimise the risk of unwanted or inappropriate contact between children and young people and adults may include for example:

- taking steps to ensure that private profiles of users registered as under the age of 18¹⁸ are not searchable (unless the user actively consents for their profile to be searchable), either on the service or via search engines;
- setting the default for full profiles to 'private' or to the user's approved contact list for those registering under the age of 13¹⁹ (some service providers set the profile default as 'private' for all users);
- ensuring that setting a profile to private means that the full profile cannot be viewed or the user contacted except by 'friends' on their contact list (users may actively choose to change their settings to public or equivalent);
- giving users control over who can access their full profile by, for example, being able to block a user from viewing their profile and 'reject' friend requests;
- giving users the option to allow only direct friends to post comments and content to their profile or to delete unwanted comments;
- giving users the option to pre-moderate comments of other users before being published on their profile;
- providing easy-to-use tools for users to report inappropriate contact from or conduct by another user;
- educating parents about available tools, both for wider internet access (for example, the benefits of using filtering tools and/or parental controls²⁰) and the tools, information and advice provided to parents by social networking sites to help them protect young people.

service is operated in any given jurisdiction. For example, it is common for US-based service providers to adopt a minimum age of 13 years for their services. This reflects the requirements of the Children's Online Privacy Protection Act (COPPA), which only allows providers to collect data without parental consent from users over 13 years old. In the absence of specific local legal requirements, however, service providers will adopt a default specification for their product which is determined by a range of factors such as company policy, adherence to industry good practice or the prevailing law in their principle market.

¹⁷ For example, the Broadband Stakeholder Group's good practice principles on audiovisual content information. See <http://www.audiovisualcontent.org/>

¹⁸ The 18+ age requirements may be difficult for services that have already been developed around the legal age of consent, e.g. 16 years. However, future services should consider using 18 years.

¹⁹ The 18+ age requirements may be difficult for services that have already been developed around the legal age of consent, e.g. 16 years. However, future services should consider using 18 years.

PRINCIPLE 4: PROVIDE EASY-TO-USE MECHANISMS TO REPORT CONDUCT OR CONTENT THAT VIOLATES THE TERMS OF SERVICE

Providers should provide a mechanism for reporting inappropriate content, contact or behaviour as outlined in their Terms of Service, acceptable use policy and/or community guidelines. These mechanisms should be easily accessible to users at all times and the procedure should be easily understandable and age-appropriate. Reports should be acknowledged and acted upon expeditiously.

Users should be provided with the information they need to make an effective report and, where appropriate, an indication of how reports are typically handled.

PRINCIPLE 5: RESPOND TO NOTIFICATIONS OF ILLEGAL CONTENT OR CONDUCT

Upon receipt of notification of alleged illegal content or conduct²¹ providers should have effective processes in place to expeditiously review and remove offending content.

Service providers should have in place arrangements to share reports of illegal content or conduct with the relevant law enforcement bodies and/or hotlines. These arrangements will depend on local jurisdiction and applicable law, as well as the existence of effective reporting frameworks.

Providers may consider including links to other local agencies or organisations, for example the relevant InHope services and law enforcement agencies. Where there is an immediate threat to safety or life, users should be advised to contact the emergency services by, for example, phoning 999 (UK) or 112 (EU).

PRINCIPLE 6: ENABLE AND ENCOURAGE USERS TO EMPLOY A SAFE APPROACH TO PERSONAL INFORMATION AND PRIVACY

Providers should provide a range of privacy setting options with supporting information that encourages users to make informed decisions about the information they post online. These options should be prominent in the user experience and accessible at all times²².

Providers should consider the implications of automatically mapping information provided during registration onto profiles, make users aware when this happens, and should consider allowing them to edit and make public/private that information where appropriate.

Users should be able to view their privacy status or settings at any given time. Where possible, the user's privacy settings should be visible at all times.

PRINCIPLE 7: ASSESS THE MEANS FOR REVIEWING ILLEGAL OR PROHIBITED²³ CONTENT/CONDUCT

SNS providers should, during the normal course of developing and managing SNSs, assess their service to identify potential risks to children and young people in order to determine appropriate procedures for reviewing reports that images, video and text may contain illegal and inappropriate/unacceptable/forbidden content and/or conduct. There is a range of procedures which can be used to promote compliance with the Terms of Use, Acceptable Use Policy and/or House Rules. These may include for example:

- human and/or automated forms of moderation;

²⁰ See some of the solutions at "Study on Safer Internet Programme BENCHMARKING of Filtering software and services" at <http://www.sip-bench.eu/index.html>

²¹ In the context of child protection, illegal content and conduct in this context refers to child abuse images and grooming respectively.

²² Social networks are used for myriad purposes and by a wide range of users. Different services have different profile formats which allow users to share different information about themselves, for example some providers encourage users to create nicknames and post avatars and create a novel online identity. These formats vary between sites.

²³ Prohibited content/conduct as defined by Terms of Use, Acceptable Use Policy and/or House Rules.

- technical tools (e.g. filters) to flag potentially illegal or prohibited content;
- community alerts;
- user-generated reports.

Some providers employ human moderators who interact in real-time with children or young people. Such providers should take reasonable steps (working within good practice frameworks²⁴ where possible or legal frameworks as applicable), to minimise the risk of employing candidates who may be unsuitable for work which involves real-time contact with children or young people.

²⁴ Home Office Internet Task Force Good Practice Guidance for the Moderation of Interactive Services for Children
<http://police.homeoffice.gov.uk/publications/operational-policing/moderation-document-final.pdf>

ANNEX 2. TESTING QUESTIONNAIRE FOR SELF-DECLARATION

Date of updated self-declaration:

Principle 1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner

FOR EACH OF THE FOLLOWING STATEMENTS, MARK WITH AN "X" THE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

Does the self-declaration state that...?	YES	NO	Comments	Not applicable (explain why not and add relevant quote from the self-declaration) ²⁵
the service provider provides <i>clear</i> guidance for children and young people on how to navigate their website safely				
the website provides guidance specifically <i>targeted</i> at children and young people on how to navigate the website safely				
the website provides educational materials to help children and young people navigate the website safely				
the signatory provides clear information about what constitutes inappropriate behaviour				
the service provider includes information about the consequences of inappropriate behaviour on the website				
the consequences of inappropriate behaviour are included in the Terms and Conditions of the website				
the consequences of inappropriate behaviour are included in other sections apart from the Terms and Conditions of the website				
the information on the consequences of inappropriate behaviour on the website is easily accessible on the website (i.e. it can be found quickly and effortlessly on the website)				
the information on the Terms and conditions is easy-to-understand for young children and teenagers				
the website offers parents, carers and/or teachers targeted links and educational material that support dialogue, trust and involvement between parents and children about responsible safer internet				
the website offers parents and/or teachers technical controls (e.g. parental filters) that support dialogue, trust and involvement between parents and children about responsible safer internet				

²⁵ If explicitly stated in the self-declaration, explain why this specific recommendation has not been included or considered by the signatory in their self-declaration. If no explicit explanation is given, simply mark the column "NO"

Assessment of Principle 1 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
1					

Principle 2: Work towards ensuring that services are age-appropriate for the intended audience²⁶

FOR EACH OF THE FOLLOWING STATEMENTS, MARK THE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

The self-declaration includes relevant information on the following:	YES	NO	Comments	Not applicable (add relevant quote from the self-declaration)
The mechanisms through which the service provider ensures limited exposure to potentially inappropriate content and contact for children				
The types of services that are considered as not appropriate for children and young people				
The minimum registration age requirements in order to subscribe to their website				
The measures taken by the provider in order to identify and delete under-age users from their services ²⁷				
The steps taken by the provider in order to prevent users from attempting to re-register with a different age if they have previously been rejected for being below the minimum age ²⁸ , e.g. by employing cookies				
The kinds of technical and/or legal constraints that are employed by the provider in order to promote compliance with minimum age requirements				
The ways in which this service provider promotes the uptake of parental controls to allow parents to manage their children's use				

²⁶ The intended audience as outlined in each providers' Terms of Service.

²⁷ Only if their Terms require a minimum age.

²⁸ Only if their Terms require a minimum age.

of the service				
The functionalities put at the disposal of content providers, partners or users in order to label, rate or age restrict content where appropriate				

Assessment of Principle 2 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
2					

Principle 3: Empower users through tools and technology

FOR EACH OF THE FOLLOWING STATEMENTS, MARK THE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

The self-declaration includes relevant information on the following:	YES	NO	Comments	Not applicable (add relevant quote from the self-declaration)
Tools and technologies employed by the service provider in order to assist children and young people in managing their experience on their service, particularly with regards to inappropriate or unwanted (but not illegal) content or conduct				
How the tools and technologies employed to assist children and young people in managing their experience on their service have been assessed in order to ensure their effectiveness				
what steps are taken by the service provider in order to ensure that private profiles of users registered as under the age of 18 are not searchable				
the service provider ensures that the default full profiles of those registering under the age of 18 has been set to 'private' ²⁹ or to the user's approved contact list ³⁰				
that the users can control who can access their full profile by, for example, being able to block a user from viewing their profile or 'reject' friends' requests				

²⁹ Ensuring that setting a profile to private means that the full profile cannot be viewed or the user contacted except by 'friends' on their contact list (users may actively choose to change their settings to public or equivalent).

³⁰ Some service providers set the profile default as 'private' for all users.

that users have the possibility (if they wish so) to allow only direct friends to post comments and content to their profile or to delete unwanted comments				
that users have the possibility to pre-moderate comments of other users before being published on their profile				
that the service provider supports the safety education of parents in order to help them protect children and young people (e.g. safety tips/information online, etc.)				
that the service provider helps parents be aware of the existence of other available safety tools/information (not just on this SNS) to help them protect young people. For instance, by educating them about the uses/ benefits of filtering tools and/or parental controls				

Assessment of Principle 3 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
3					

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service

FOR EACH OF THE FOLLOWING STATEMENTS, MARK THE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

The self-declaration include relevant information on the following:	YES	NO	Comments	Not applicable (add relevant quote from the self-declaration)
The mechanisms employed to report inappropriate content, contact or behaviour that violates the Terms of Service ³¹				
The mechanisms to report inappropriate content, contact or behaviour that violates their Terms of Service should be <i>easily accessible</i> to users				

³¹ As outlined in the SNS Terms of Service, acceptable use policy and/or community guidelines

The mechanisms to report inappropriate content, contact or behaviour that violates their Terms of Service should be <i>available to users at all times</i>				
The procedure to report inappropriate content, contact or behaviour that violates the Terms of Service should be <i>easily understandable</i> for children and young people as well as for adults				
The procedure to report inappropriate content, contact or behaviour that violates the Terms of Service should be <i>age-appropriate</i>				
If/how the reports are acknowledged, e.g. by means of an acknowledgement e-mail sent to the potential user at risk and indicating the steps to be taken by the service provider, etc.				
The reports are acted upon <i>expeditiously</i>				
how users are provided with the information they need to make an effective report				
Users are provided with an indication of how reports are typically handled (if appropriate)				

Assessment of Principle 4 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
4					

Principle 5: Respond to notifications of illegal content or conduct

FOR EACH OF THE FOLLOWING STATEMENTS, MARK THE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

Does the self-declaration state that...?	YES	NO	Comments	Not applicable (add relevant quote from the self-declaration)
Upon receipt of notification of alleged illegal content or conduct, the service provider has effective processes in place to <i>expeditiously</i> review and remove offending content				

the service provider implements appropriate mechanisms to decide what (offending) content to review				
the service provider implements appropriate mechanisms to remove content found offending				
the processes of reviewing and removing offending content are effective and expeditious				
the service provider has implemented arrangements to share reports of illegal content or conduct with the relevant law enforcement bodies and/or hotlines ³²				
the service provider includes relevant links to other local agencies or organizations in order to support the process of reporting illegal content or conduct (e.g. InSafe, law enforcement agencies, etc.)				

Assessment of Principle 5 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
5					.

Principle 6: Enable and encourage users to employ a safe approach to personal information and privacy

FOR EACH OF THE FOLLOWING STATEMENTS, MARK ONE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

Does the self-declaration state that...?	YES	NO	Comments	Not applicable (add relevant quote from the self-declaration) ³³
users of this SNS are provided with a range of privacy setting options				
users are provided with supporting information to help them make informed decisions about the information they post online				
the privacy settings options are accessible at all times				
the privacy settings options are prominent on the SNS				

³² These arrangements will depend on local jurisdiction and applicable law, as well as the existence of effective reporting frameworks

³³ If explicitly stated in the self-declaration, explain why this specific recommendation has not been included or considered by the signatory in their self-declaration. If no explicit explanation is given, simply mark the column “NO”

The service provider has taken into consideration the implications of automatically uploading information provided by users (during registration) onto their profiles				
the service provider notifies users when any information provided (during their registration) is automatically uploaded onto their profiles				
the service provider allows users, where appropriate, to edit and make public/private the information (provided during registration) that is automatically uploaded onto their profiles				
users are allowed to view their privacy status or settings at any given time				

Assessment of Principle 6 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
6					

Principle 7: Assess the means for reviewing illegal or prohibited³⁴ content/conduct

FOR EACH OF THE FOLLOWING STATEMENTS, MARK THE BOX THAT BEST DESCRIBES YOUR ASSESSMENT OF THE SELF-DECLARATION OF THE SNS YOU ANALYZED.

Does the self-declaration include relevant information on the following?	YES	NO	Comments	Not applicable (add relevant quote from the self-declaration) ³⁵
If and how the SNS provider assesses their service to identify potential risks to children and young people				
the mechanisms employed by the SNS provider in order to determine the most appropriate procedures for reviewing reports of illegal or inappropriate content or conduct				

³⁴ Prohibited content/conduct as defined by Terms of Service, Acceptable Use Policy and/or House Rules

³⁵ If explicitly stated in the self-declaration, explain why this specific recommendation has not been included or considered by the signatory in their self-declaration. If no explicit explanation is given, simply mark the column "NO"

the types of procedures employed by the SNS provider in order to promote compliance with the Terms of Service, Acceptable Use Policy and/or House Rules (e.g. human and/or automated forms of moderation; technical tools (e.g. filters) to flag potentially illegal or prohibited content; user-generated reports, etc.				
Where human moderators are employed, reasonable steps are taken to minimize the risk of employing candidates who may be unsuited for work which involves real-time contact with children or young people				

Assessment of Principle 7 on the self-declaration

Principle	How satisfactory is the Assessment of this Principle on the self-declaration?			What has been well-implemented so far?	Areas for further improvement
	Very satisfactory	Rather Satisfactory	Unsatisfactory		
7					

ANNEX 3. TESTING SCENARIO SNS WEBSITE

Name of SNS being reviewed						
URL of SNS						
Date(s) of testing						
Name of tester						
Contact e-mail of tester						
Contact phone of tester						
Browser used for testing	Chrome	Firefox	I Explorer(7/8)	Opera	Safari	Other, please specify

Section 1

Principle 1: Raise awareness of safety education messages and acceptable use policies to users, parents, teachers and carers in a prominent, clear and age-appropriate manner.

1. IN THE FOLLOWING EXERCISE YOU WILL HAVE TO MEASURE THE TIME IT TAKES YOU TO FIND SOME INFORMATION ON THE SNS YOU ARE TESTING. USE A CHRONOMETER TO MEASURE THE EXACT AMOUNT OF TIME IT TAKES YOU TO FIND THE FOLLOWING INFORMATION. START ALL THE TASKS FROM THE HOMEPAGE OF THE SNS WITHOUT REGISTERING AS A USER.

Starting from the homepage, find information about	Time (in seconds) to find this info	Info not available on this SNS
Terms of Use		
Privacy information		
Tips or educational material on how to use the internet safely (for children)		
Tips or educational material on how to use the internet safely (for parents, teachers, other carers)		
Tips or educational material on how to use this SNS safe safely (for children)		
Tips or educational material on how to use this SNS safely (for parents, teachers, other carers)		
External links/referrals to educational materials about child safety		
External links/referrals about organizations/authorities active in child safety, e.g. Insafe, national hotline, police, etc.		

2. WITHOUT REGISTERING AS A USER, YET. PLEASE ANSWER THE FOLLOWING QUESTIONS:

This SNS contains the following type of information. Please mark all that applies:	YES	NO	Observations
Tips/information for children and young people on how to navigate this specific website safely and responsibly			
Tips/information for parents, teachers or other adult carers on how to help their children navigate this website safely			
Terms of use/service for this SNS			
Information on what constitutes inappropriate behaviour on this website and the consequences thereof (e.g. a code of conduct)			
Privacy policy or privacy information about this SNS			
General safety tips/information specifically targeted at children and young people on how to surf the Internet safely and responsibly, for instance through 'Help pages'			
General safety tips/information or educational materials specifically targeted at parents, teachers or other carers to help children surf the Internet safely and responsibly			

3. WHAT KIND OF INFORMATION DOES THIS SNS PROVIDE ABOUT SPECIFIC ONLINE RISKS? PLEASE MARK ALL THAT APPLIES

Does this SNS provide any information regarding the following online risks? Please choose ALL that apply	YES	YES, but it is difficult to understand for children and young people	NO	Observations
The possibility of seeing or being the subject of images of child abuse				
Hate speech				
Pornography or sexual content				
Violence				
Inappropriate contact from adults with a sexual interest in children				
Bullying				
Divulging personal information				

Posting sexually provocative photographs				
Information on self-harm actions (anorexia, suicide, etc.)				
Other, please specify:				

4. WHAT IS THE FORMAT OF THE SAFETY INFORMATION PROVIDED ON THIS SNS? CHOOSE ALL THAT APPLY

The safety (educational) information on this SNS contains (Please mark all that applies):	YES	NO	Observations
Audio-visual fragments (video / audio fragments, animations, etc.)			
Quizzes or games			
Concrete examples related to safety (e.g. anecdotes, information on concrete consequences of safety threats, etc.)			
External links/referrals to educational materials about child safety			
External links/referrals about organizations/authorities active in child safety, e.g. Insafe, national hotline, police, etc.			
Written texts about safety			
If written texts are used, short pieces of text are used (no more than 1 or 2 short paragraphs per idea/caption)			
If written texts are used, they are formatted with sub heads, bullets and other devices (e.g. visible links) that facilitate skimming and scanning of info rather than plain reading			
Other (Please specify)			

5. WHAT KIND OF INFORMATION IS PRESENT IN THE TERMS OF SERVICE/USE OF THIS SNS? PLEASE CHOOSE ALL THAT APPLY

In their Terms of Service/use does this SNS clearly state the following? Please choose ALL that apply	YES	YES, but it is difficult to understand for children/young people	NO	Observations
Content that is not allowed on the social network (e.g. pornographic or racist content)				
Conduct (behaviour/actions) that is not allowed (e.g. bullying, harassment, racist comments)				
Consequences of engagement in prohibited behaviour/actions (e.g. your user profile/messages/photos might be deleted, or police contacted)				
Age requirements				

6. WHAT IS THE FORMAT OF THE INFORMATION ABOUT THE TERMS OF SERVICE/USE OR CODE OF CONDUCT PROVIDED ON THIS SNS? CHOOSE ALL THAT APPLY

The information about the Terms of service/use or Code of conduct provided on this SNS is presented in the form of (Please mark all that applies):	YES	NO	Observations
Audio-visual fragments (video / audio fragments, animations, etc.)			
Quizzes or games			
Concrete examples related to safety (e.g. anecdotes, information on concrete consequences of safety threats, etc.)			
External links/referrals to educational materials about child safety			
External links/referrals about organizations/authorities active in child safety, e.g. Insafe, national hotline, police, etc.			
Written texts about the Terms and conditions			

If written texts are used, short pieces of text are used (no more than 1 or 2 short paragraphs per idea/caption)			
If written texts are used, they are formatted with sub heads, bullets and other devices (e.g. visible links) that facilitate skimming and scanning of info rather than plain reading			
Other (please specify)			

7. THINKING FROM THE PERSPECTIVE OF A CHILD YOUNGER THAN 13 YEARS OLD (E.G. PERSONA MINOR 3), ANSWER THE FOLLOWING QUESTIONS. IF THE SNS YOU ARE TESTING HAS A MINIMUM AGE REQUIREMENT OF 13 YEARS OLD, THE QUESTIONS ON THIS SECTION (SECTION 7) SHOULD NOT BE ANSWERED. PLEASE CONTINUE WITH SECTION 8.

The safety tips and educational materials on this SNS	YES	NO	Observations
are presented using plain and succinct language appropriate for a child of this age			
do not contain technical jargon difficult for a child of this age to understand			
are easily seen because they are prominently placed on the SNS			
there is no need to excessively scroll the webpage(s) to find this information			
The information related to the website privacy and safety policy (e.g. Terms and Conditions, Safety policy, Code of conduct, etc.)			
is presented using plain and succinct language for a child of this age			
does not contain excessive technical jargon difficult for a child of this age to understand			
is easily seen because it is prominently placed on the SNS			
there is no need to excessively scroll the webpage(s) to find this information			

8. THINKING FROM THE PERSPECTIVE OF A 13-17 YEARS OLD TEENAGER (E.G. PERSONA MINOR 1 OR 2), ANSWER THE FOLLOWING QUESTIONS:

The safety tips and educational materials on this SNS	YES	NO	Observations
are presented using plain and succinct language appropriate for a child of this age			
do not contain excessive technical jargon difficult for a child of this age to understand			
are easily seen because they are prominently placed on the SNS			

The information related to the website privacy and safety policy (e.g. Terms and Conditions, Safety policy, Code of conduct, etc.)			
is presented using plain and succinct language for a child of this age			
does not contain excessive technical jargon difficult for a child of this age to understand			
is easily seen because it is prominently placed on the SNS			

Alternative ways of implementing Principle 1 on this SNS website

1. Here refer to any alternative ways this Principle has been implemented on this specific website and which has not been included in this test
2. Clearly specify the places on the website where such information/application(s) is/are placed by adding link(s) to the application/functionality in question, links to relevant additional information on the website, etc.

Section 2

Principle 2: Work towards ensuring that services are age-appropriate for the intended audience

1. WHICH OF THE FOLLOWING STATEMENTS ARE TRUE OF THE SNS YOU ARE TESTING?

This SNS website:	YES	NO	Observations
clearly indicates which services are not appropriate for children and young people or where a minimum registration age applies			
Encourages the uptake of parental controls by prominently displaying how these tools allow parents to manage their children's use of the service			
allows users to label, rate or age restrict content where appropriate			
allows a parent to monitor their child's activities on the SNS			

BEFORE CONTINUING ANSWERING THE NEXT SERIES OF QUESTIONS YOU MUST CREATE AN ACCOUNT OF A MINOR ON THIS SNS. WHILE SIGNING UP ONLY INCLUDE THE MINIMUM INFORMATION REQUIRED BY THIS SNS. IF YOU ARE ASKED ANY MANDATORY INFORMATION TO SIGN UP USE THE DATA FROM PERSONA MINOR 3.

IF DURING THE TEST YOU ARE REQUIRED TO PROVIDE ANY EXTRA PERSONAL INFORMATION NOT CONTAINED IN THE PERSONA'S DESCRIPTION, BASE YOURSELF IN THE DESCRIPTION PROVIDED IN ORDER TO CREATE CREDIBLE INFORMATION THAT MATCHES THE CURRENT PERSONA. IF NECESSARY, YOU MAY PROVIDE CREDIBLE BUT NOT REAL ADDRESSES AND/OR TELEPHONE NUMBERS.

2. WHAT TYPE OF INFORMATION DOES THIS SNS REQUIRE FROM YOU TO LET YOU SIGN UP?

When trying to sign up as a 9-year old the SNS requires me to submit the following information. Mark all that applies:	Yes	No	Not available on this SNS	Observations
Name				
Nickname				
e-mail*				
Date of birth				
Sex				

Address or place of residence				
Other, please specify:				

* If asked for your e-mail for verification purposes DO NOT check your e-mail, yet

3. AFTER SIGNING UP AS 9-YEAR OLD USER, WHAT HAPPENED?

What happened during/after signing up?	YES	NO	Not available on this SNS	Observations
I was able to sign up because this SNS is not age-restricted				
I was able to sign up even though 9-year old children are not supposed to use this SNS				
I was able to sign up even without verifying my e-mail** address				
I was able to sign up only after clicking on the verification link** sent to me via e-mail (If necessary you can check your e-mail verification now)				
I was not able to sign up. The SNS denied the signing up due to age restrictions				
I was not able to sign up. The SNS denied the signing up, but I was not told why				
Other. Please specify:				

**If you were not asked for e-mail verification during sign up mark N/A

IF YOU WERE REJECTED TO CREATE AN ACCOUNT ON THIS SNS FOR BEING UNDER THE MINIMUM AGE REQUIREMENT TRY TO SIGN UP AGAIN, BUT THIS TIME USE AN AGE JUST ABOVE THE MINIMUM AGE REQUIRED BY THIS SNS TO SIGN UP. DO NOT CHANGE ANY OF YOUR COMPUTER SETTINGS (E.G. DO NOT REMOVE ANY COOKIES OR BROWSING HISTORY).

4. AFTER SIGNING UP AS A CHILD ABOVE THE MINIMUM AGE REQUIRED BY THIS SNS, WHAT HAPPENED?

What happened when trying to sign up this time? Mark all that applies	YES	NO	Not available on this SNS	Observations
I was able to sign up because this SNS is not age-restricted				
I was able to sign up even though this SNS is supposed to be age-restricted				
I was able to sign up even without verifying my e-mail** address				

I was able to sign up only after clicking on the verification link** sent to me via e-mail (If necessary you can check your e-mail verification now)				
I was not able to sign up. The SNS denied the signing up due to age restrictions				
I was not able to sign up. The SNS denied the signing up, but I was not told why				
I was not able to sign in because of my previous attempt to sign up as a 9 year-old child. The SNS has installed cookies on my computer that do not allow me to sign up again from this computer.				
Other. Please specify:				

**If you were not asked for e-mail verification during sign up mark N/A

IF YOUR PREVIOUS ATTEMPTS TO SIGN UP AS A MINOR HAVE FAILED, PLEASE REMOVE ANY COOKIES THAT MAY HAVE BEEN INSTALLED ON YOUR COMPUTER AND SIGN UP AGAIN USING THE MINIMUM AGE REQUIRED BY THIS SNS. IF THIS DOES NOT WORK TRY SIGNING UP FROM ANOTHER COMPUTER.

5. AFTER SIGNING UP AS A CHILD ABOVE THE MINIMUM AGE REQUIRED BY THIS SNS, WHAT HAPPENED?

What happened when trying to sign up this time? Mark all that applies	YES	NO	Not available on this SNS	Observations
I was able to sign up because this SNS is not age-restricted				
I was able to sign up even though this SNS is supposed to be age-restricted				
I was able to sign up even without verifying my e-mail** address				
I was able to sign up only after clicking on the verification link** sent to me via e-mail (If necessary you can check your e-mail verification now)				
I was not able to sign up. The SNS denied the signing up due to age restrictions				
I was not able to sign up. The SNS denied the signing up, but I was not told why				
I was not able to sign in because of my previous attempt to sign up as a 9 year-old child. The SNS has installed cookies on my computer that do not allow me to sign up again from this computer.				
Other. Please specify:				

****If you were not asked for e-mail verification during sign up mark N/A**

FOR THE REST OF THE TEST YOU WILL HAVE TO USE 4 NEW USER ACCOUNTS: TWO OF ADULT PROFILES AND TWO OF MINOR PROFILES. CREATE THESE ACCOUNTS USING THE INFORMATION FROM THE 2 GIRL TEENAGE (MINOR 1 AND 2) AND THE 2 ADULT PERSONAS YOU WERE GIVEN TOGETHER WITH THE INSTRUCTIONS OF THIS TEST.

IF DURING THE TEST YOU ARE REQUIRED TO PROVIDE ANY EXTRA PERSONAL INFORMATION NOT CONTAINED IN THE PERSONAS' DESCRIPTION, BASE YOURSELF IN THE DESCRIPTION PROVIDED IN ORDER TO CREATE CREDIBLE INFORMATION THAT MATCHES THE CURRENT PERSONA. IF NECESSARY YOU MAY PROVIDE CREDIBLE ADDRESS OR TELEPHONE NUMBER(S), BUT, BY NO MEANS, REAL ONES!

5. SIGN UP AS MINOR 1 AND ADULT 1, WHAT KIND OF INFORMATION DOES THIS SNS REQUIRE FROM EACH OF THESE USERS?

When signing up the SNS requires you to submit the following information. Mark all that applies:	As minor 1	As adult 1	Observations
Real name (First and last)			
Real name (only first)			
Nickname			
e-mail*			
Date of birth			
Gender			
Education			
Nationality			
Religion			
Home address			
Place of residence			
School or work address			
Personal security/identification number			
Telephone or cell phone number			
Other, please specify:			

BEFORE CONTINUING WITH THE TEST, FOLLOW THESE STEPS:

1. DO NOT CHANGE ANY SETTINGS ON YOUR SNS ACCOUNTS BECAUSE IN THE NEXT SECTION YOU WILL HAVE TO PERFORM SOME TESTS WITH THESE *DEFAULT* SETTINGS
2. AFTER HAVING SIGNED UP AS MINOR 1 AND ADULT 1, MAKE EACH OF THE PROFILES YOU CREATED AS REALISTIC AND COMPLETE AS POSSIBLE BY ADDING THE PERSONAL INFORMATION AND UPLOADING THE PHOTOS YOU WERE PROVIDED WITH AT THE BEGINNING OF THIS TEST
3. CREATE USER ACCOUNTS FOR MINORS 1 AND 2 AND FOR ADULTS 1 AND 2. ADD AS MUCH INFORMATION AS POSSIBLE TO EACH OF THESE PROFILES, BUT DO NOT CHANGE ANY SETTINGS. THE ACCOUNT SETTINGS SHOULD BE THE DEFAULT ONES.
4. “ADULT 2” SHOULD NOT BE FRIENDS/CONTACT OF THE OTHER USERS YOU CREATED
5. FROM NOW ON YOU WILL BE ASKED TO USE ONE OR SEVERAL OF THE USER PROFILES YOU CREATED. DEPENDING ON THE QUESTION YOU HAVE TO ANSWER, SIGN IN WITH THE MOST APPROPRIATE PROFILE FOR THIS PURPOSE
6. PLEASE WRITE DOWN THE USER NAMES, PASSWORDS AND AGE OF THE FOLLOWING ACCOUNTS:

User name Adult 1:	
Password Adult 1 account:	
Age:	
User name Adult 2:	
Password Adult account:	
Age:	
User name Minor 1:	
Password Minor 1 account:	
Age:	
User name Minor 2:	
Password Minor 2 account:	
Age:	
User name Minor 3:	
Password Minor 3 account:	
Age:	

Alternative ways of implementing Principle 2 on this SNS website

1. Here refer to any alternative ways this Principle has been implemented on this specific website and which has not been included in this test
2. Clearly specify the places on the website where such information/application(s) is/are placed by adding link(s) to the application/functionality in question, links to relevant additional information on the website, etc.

Section 3

Principle 3: Empower users through tools and technology

1. USING THE DEFAULT SETTINGS OF YOUR SNS ACCOUNT, I.E. WITHOUT CHANGING ANY SETTINGS, SIGN IN AS “ADULT 1” AND INVITE “MINOR 1” TO BECOME YOUR “FRIEND”. ANSWER THE FOLLOWING QUESTIONS:

By default, when signed in as “Adult 1”:	YES	NO	I don’ know/it doesn’t say	Observations
I am allowed to add minors to my contacts list without any restrictions				
I am allowed to add minors to my contacts list but before being able to do it I receive a warning (e.g. Are you sure you know this person?)				
I need to sign a special agreement/form before being able to add children to my contacts list				
I receive information on the consequences of contacting minors in non-appropriate ways according to the Terms of Use				
I am not allowed to add children to my contact list				

2. USING THE DEFAULT SETTINGS OF YOUR SNS ACCOUNT, I.E. WITHOUT CHANGING ANY SETTINGS, SIGN IN AS “MINOR 1”, ACCEPT ADULT 1’S INVITATION TO BE YOUR FRIEND. THEN, SIGN IN AS ADULT 2 (NOT A FRIEND OF MINOR 1) AND TRY TO GET IN TOUCH WITH MINOR 1 (E.G. VIA A MESSAGE).ANSWER THE FOLLOWING QUESTIONS:

By default, when signed in as “Minor 1”:	YES	NO	I don’ know/it doesn’t say	Observations
I am allowed to add adults to my contacts list without any restrictions				
I am allowed to add adults to my contacts list but before I receive a warning (e.g. Are you sure you know this person?)				
I need parental consent before allowing adults to become members of my contacts list				
I receive safety guidance on dangerous contacts before accepting an adult as ‘friend’/contact				
I am not allowed to add an adult as a contact				
I can be contacted by “Adult 2” even if he’s not part of my friends/contacts				

USING THE DEFAULT SETTINGS OF YOUR SNS ACCOUNTS, I.E. WITHOUT CHANGING ANY SETTINGS ON ANY OF THE ACCOUNTS, INDICATE WHICH INFORMATION ABOUT “MINOR 1” IS VISIBLE TO THE FOLLOWING PEOPLE. PLEASE PAY ATTENTION TO THE FOLLOWING:

- MAKE SURE YOUR MINOR 1 AND MINOR 2 PROFILES CONTAIN AS MUCH INFORMATION AS POSSIBLE (E.G. LIKES, RELIGION, HOBBIES, ETC.). IF POSSIBLE ON THIS SNS, POST 1 OR 2 PICTURES OF EACH OTHERS IN EACH OTHER’S PROFILES AND TAG THEM.
- ADD A FEW APPLICATIONS/GAMES/QUIZZES, ETC. TO ALL YOUR PROFILES SO THAT THEY LOOK ACTIVE
- TO SEARCH THE PROFILE OF MINOR 1 **AS A USER** OF THIS SNS, ONLY EMPLOY THE INTERNAL SEARCH ENGINE OF THE SNS YOU ARE TESTING.
- TO SEARCH THE PROFILE OF MINOR 1 **AS A NON-USER** OF THIS SNS (I.E. NOT SIGNED-IN AS A USER), USE THE FOLLOWING SEARCH ENGINES TO SEARCH FOR INFORMATION ON “MINOR 1”: [GOOGLE](#), [MSN SEARCH](#) AND [YAHOO SEARCH](#)
- IN BOTH CASES USE THE NAME **AND** THE SURNAME OF “MINOR 1” BETWEEN INVERTED COMMAS (E.G. “ASTRID HANSEN”) AS KEY SEARCH TERMS

By default, Which of the following information is ‘public’/visible to whom? Mark all that applies:	My current profile contains the following information	Visible to “Minor 2”	Visible to “Adult 1” (your contact)	Visible to “Adult 2” (user of this SNS, but not your contact)	Visible to other people who are non-users of this SNS	Observations
Real name (First and last)						
Real name (only first)						
Nickname						
e-mail*						
Date of birth						
Gender						
Political views						
Education						
Nationality						
Likes/dislikes						
Hobbies						
Religion						
Home address						
Place of residence						
School or work address						
Personal security/identification number						

Telephone or cell phone number						
Pictures of you						
Pictures/videos of me uploaded by me or by others						
My online status						
My list of contacts/"friends"						
Comments/messages posted by other users on my "public profile" (meant to be viewed by others)						
Applications I use (e.g. Flickr, quizzes, etc.)						
Other, please specify:						

4. SIGN IN AS "MINOR 1". USING THE DEFAULT SETTINGS OF THIS ACCOUNT, I.E. WITHOUT CHANGING ANY SETTINGS, INDICATE WHICH OF THE FOLLOWING THINGS YOU CAN DO

By default, when signed in as "Minor 1":	YES	YES, but I need permission from the user who posted it on my profile	NO	Not available on this SNS	Observations
I am able to delete postings/comments I have made on my 'public profile', i.e. my profile as others can see it					
I am able to delete pictures/videos I have uploaded on my public profile (i.e. by deleting tags)					
I am able to delete postings/comments others have made about me on my 'public profile'					
I am able to delete pictures/videos others have uploaded of me on my public profile (i.e. by deleting tags)					

5. SIGN IN AS “MINOR 1”. USING THE DEFAULT SETTINGS OF THIS ACCOUNT, I.E. WITHOUT CHANGING ANY SETTINGS, INDICATE WHICH OF THE FOLLOWING THINGS CAN HAPPEN ON YOUR PROFILE.

By default, when signed in as “Minor 1”:	YES	YES, but I must approve it before it is published	NO	Not available on this SNS	Observations
All users can post comments on my public profile (e.g. on my wall)					
Only my contacts/friends can post comments on my public profile					
All users can upload videos/photos (including of myself) on my public profile					
Only my contacts/friends can upload videos/photos of me on my public profile					
All users can send me private messages (messages that only the sender and I can see)					
Only my contacts/friends can send me private messages					

6. KEEP ON USING YOUR PROFILE “MINOR 1”. EXPLORE THE PRIVACY SETTINGS ON YOUR PROFILE AND ANSWER THE FOLLOWING QUESTIONS. IF NEEDED SIGN IN AS OTHER USERS AS WELL.

As “Minor 1” on this SNS, I can do the following:	YES	NO	Observations
report abuse or bullying			
block other users from contacting me			
block other users from viewing my profile			
reject friendship requests			
Specify who or which groups of users can contact me (defined by age, gender, etc.)			
Restrict the search options of other users so that they cannot find me (e.g. Do not allow adults to find/contact me)?			
Set my profile to private, i.e.my full profile cannot be viewed or I cannot be contacted except by ‘friends’ on my contact list			
I have to change settings before my personal information can be			

visible to adult users			
I have to change settings for my personal information (all the information contained on my current profile including pictures, contacts list, posts, etc.) to be viewed by other minors			
I have control over the display of my online status. I can decide if other people can see me when I'm online			
I am notified when I am identified (tagged) in pictures/videos, etc. posted on other people's profiles			

7. KEEP ON USING YOUR PROFILE "MINOR 1". IN RELATION TO THE PRIVACY SETTINGS YOU JUST EXPLORED, HOW EASY/DIFFICULT WAS IT TO DO THE FOLLOWING?

On the SNS, how easy was it to...?	Very easy	easy	Not easy but not difficult	difficult	Very difficult	Not available on this SNS
report abuse or bullying						
block other users from contacting me						
Block other users from viewing my profile						
reject friendship requests						
Specify who or which groups of users can contact me (defined by age, gender, etc.)						
Restrict the search options of other users so that they cannot find me (e.g. Do not allow adults to find/contact me)?						
Set my profile to private, i.e. my full profile cannot be viewed or I cannot be contacted except by 'friends' on my contact list						
Change settings before my personal information could be visible to adult users						
Change settings for my personal information (all the information contained on my current profile including pictures, contacts list, posts, etc.) to be viewed by other minors						
Control the display of my online status (i.e. deciding if other people can see me when I'm online)						

8. KEEP ON USING YOUR PROFILE “MINOR 1”. WHAT HAPPENS WHEN YOU WANT TO UPLOAD PICTURES OR POST INFORMATION TO YOUR PROFILE?

As “Minor 1”, when I am about to upload pictures/post information, I get:	YES	NO	Observations
Technical guidance on how to upload photos/videos			
Safety warnings/guidance about uploading photos/videos online			
Technical guidance on how to post information/comments			
Safety warnings/guidance on publishing personal information online			

9. WITHOUT SIGNING IN AS ANY USER, IS THERE INFORMATION ON THIS SNS ABOUT THE FOLLOWING?

Does this SNS provide the following information?	YES	NO	Observations
Information/tips for parents on the available tools for wider internet access (e.g. the benefits of using filtering tools and/or parental controls) and how they can be used to help them protect young people			
Information/tips for parents on the available tools on this SNS (e.g. parental controls, filtering tools, etc. provided by this SNS) and how they can be used to help them protect young people			

Alternative ways of implementing Principle 3 on this SNS website

1. Here refer to any alternative ways this Principle has been implemented on this specific website and which has not been included in this test
2. Clearly specify the places on the website where such information/application(s) is/are placed by adding link(s) to the application/functionality in question, links to relevant additional information on the website, etc.

Section 4

Principle 4: Provide easy-to-use mechanisms to report conduct or content that violates the Terms of Service

1. IN THE FOLLOWING EXERCISE YOU WILL HAVE TO MEASURE THE TIME IT TAKES YOU TO FIND THE REPORTING MECHANISMS ON THE SNS YOU ARE TESTING. USE A CHRONOMETER TO MEASURE THE EXACT AMOUNT OF TIME IT TAKES YOU TO FIND THEM. START ALL THE TASKS FROM THE HOMEPAGE OF THE SNS

Starting from the homepage, find the following:	Time (in seconds) to find this info	Info not available on this SNS
Abuse Report Form		
Report abuse via e-mail		
Link to abuse report form from an external local agency or organization, e.g. Inhope, Insafe, ChildNet, etc.		
A hotline/phone number to contact a safety expert/responsible from within this SNS		
A hotline/phone number to contact a safety expert from another organization		
A link/information on Violation of terms and where and how to report them		
An indication of how reports are typically handled by this SNS		
Other reporting mechanism, please specify:		

2. READ CAREFULLY THE TERMS OF SERVICE, ACCEPTABLE USE POLICY AND/OR COMMUNITY GUIDELINES PROVIDED ON YOUR SNS AND ANSWER THE FOLLOWING QUESTIONS:

Mention all the possible mechanisms and tools available to report abuse/violations of Terms of Use/policy on this site:	YES (add URL on SNS)	NO, Not available on this SNS	Observations
Abuse Report Form			
Report abuse via e-mail			
Link to abuse report form from an external local agency or organization, e.g. Inhope, Insafe, ChildNet, etc.			
A hotline/phone number to contact a safety expert/responsible from within this SNS			
A hotline/phone number to contact a safety expert from another organization			
A link/information on Violation of terms and where and how to report them			
An indication of how reports are typically handled by this SNS			
Other, please specify:			

- SIGN IN AS MINOR 2 (OLIWIA). POST “NASTY COMMENTS” ABOUT MINOR 1 ON HER PUBLIC PROFILE (I.E. WALL, ETC.). USE THE “NASTY COMMENTS” DOC. YOU WERE GIVEN AT THE BEGINNING OF THIS TEST. TRANSLATE THOSE COMMENTS INTO THE LOCAL LANGUAGE OF THE SNS YOU ARE TESTING AND POST THEM ON MINOR 1’S PROFILE.
- SIGN IN AS MINOR 3 (FRÉDÉRIC) AND SEND MINOR 1 ONE OF THE THREE BULLYING PICTURES (PIG, PIGGY OR WITCH). POST THE OTHER TWO PICTURES ON MINOR’S 1 PUBLIC PROFILE SO THAT OTHER USERS CAN ALSO SEE THEM
- SIGN 1 AS MINOR 1. DO NOT DELETE ANY OF THE BULLYING PICTURES OR COMMENTS POSTED ON YOUR PROFILE. REPORT THIS SITUATION USING THE REPORTING TEXT YOU WERE GIVEN. DO NOT ADD ANY EXTRA INFORMATION TO THIS TEXT. ANSWER THE FOLLOWING QUESTIONS:

3. ANSWER THE FOLLOWING QUESTIONS IN RELATION TO THE REPORTING MECHANISMS/TOOLS AVAILABLE ON THIS SNS

In relation to the reporting mechanism/tool available on the site	Yes	No	Not available on this website	Observations
The instructions on how to use the reporting tools/mechanism are written using plain and succinct language, easy for a child of this age to understand				
The instructions on how to use the reporting tools/mechanism do not contain excessive technical jargon difficult for a child of this age to understand				
The instructions on how to use the reporting tools/mechanism are easily seen because they are prominently placed on the SNS				
there is no need to excessively scroll the webpage(s) to find instructions on how to use the reporting tools/mechanism				
The reporting mechanism/tool can be accessed at all times from the SNS				
There is a link to the report mechanism/tool on every page on this SNS				
I could successfully report abuse without encountering any difficulties in the whole process				
I could report abuse, but I encountered some difficulties during the process (please specify which difficulties you encountered in the comments section)				
The report mechanism/tool sends a notification of receipt to the user indicating that the report is being handled				
The report mechanism gives feedback to the user about the report result. If so, how long did it take to get an answer?				
Abuse report mechanism/tool asked for information I could not provide				
Abuse report mechanism/tool asked for unnecessary or irrelevant information* (i.e. additional details without which an efficient report could still be handled). *Include concrete examples of unnecessary information in the Observations section				
If there are forums or volunteer moderators on this SNS, can you report				

your problem to them or ask them for advice on how to report your problem?				
If you contacted any volunteer moderator or forum on your SNS, did you get successful guidance/information from them?				

Alternative ways of implementing Principle 4 on this SNS website

1. Here refer to any alternative ways this Principle has been implemented on this specific website and which has not been included in this test
2. Clearly specify the places on the website where such information/application(s) is/are placed by adding link(s) to the application/functionality in question, links to relevant additional information on the website. etc.

Section 5

Principle 6: Enable and encourage users to employ a safe approach to personal information and privacy

1. SIGN IN AS “MINOR 1”, WHICH OF THE FOLLOWING INFORMATION NEEDS YOUR PERMISSION BEFORE BEING VISIBLE TO OTHER USERS?

Which of the following information needs your permission before being made public, i.e. visible to the following people? Mark all the instances that require your consent	Visible to “Minor 2” after your consent	Visible to “Adult 1” (your contact) after your consent	Visible to “Adult 2” (user of this SNS, but not your contact) after your consent	Visible to other people who are non-users of this SNS after your consent	Observations
Real name (First and last)					
Real name (only first)					
Nickname					
e-mail*					
Date of birth					
Gender					

Political views					
Education					
Nationality					
Likes/dislikes					
Hobbies					
Religion					
Home address					
Place of residence					
School or work address					
Personal security/identification number					
Telephone or cell phone number					
A picture of you					
Pictures/videos of me uploaded by me or by others					
My online status					
My list of contacts/"friends"					
Comments/messages posted by other users on my "public profile" (meant to be viewed by others)					
Applications I use					
Other, please specify:					

2. EXPLORE THE PRIVACY SETTINGS OPTIONS AND GUIDANCE AVAILABLE ON THIS SNS AND ANSWER THE FOLLOWING QUESTIONS

In relation to privacy information/guidance available on this SNS...	YES	NO	Observations
While adding information to your profile, were you informed/made aware that (some of) this information would be made visible/available to other users?			
Did you receive any supporting information on the consequences of posting this information online?			
Did you get any information/guidance on how make your profile as			

private as possible?			
Are you able to view your privacy status or settings at any given time?			

3. IN THIS SECTION YOU WILL HAVE TO EXPLORE SOME OF THE PRIVACY SETTINGS AVAILABLE ON THIS SNS. FOLLOW THE INSTRUCTIONS:

- SIGN IN AS **MINOR 1**
- MINOR 2 HAS POSTED SOME NASTY COMMENTS ABOUT YOUR PICTURES. RESTRICT MINOR'S 2 ACCESS TO YOUR PICTURES AND DO NOT ALLOW HIM/HER TO POST COMMENTS ON YOUR PUBLIC (VISIBLE TO OTHER USERS) PROFILE.
- YOU DO NOT WANT ADULT 2 TO BE ABLE TO HAVE ACCESS TO ANY OF YOUR INFORMATION ON YOUR PROFILE. BLOCK THIS USER.
- RIGHT AFTER ANSWERING QUESTIONS 3 AND 4 MAKE SURE YOUR PRIVACY SETTINGS ARE SET BACK TO THE DEFAULT PRIVACY SETTINGS, I.E. UNDO ALL THE PRIVACY SETTINGS YOU MAY HAVE CHANGED.

After having restricted access to your profile to Minor 2 and adult 2, can they still access any of the following information on your profile? Can other users still have access to the following information on your profile?	Visible to "Minor 2" after your consent	Visible to "Adult 1" (your contact) after your consent	Visible to "Adult 2" (user of this SNS, but not your contact) after my consent	Visible to other people who are non-users of this SNS after your consent	Observations
Real name (First and last)					
Real name (only first)					
Nickname					
e-mail*					
Date of birth					
Gender					
Political views					
Education					
Nationality					
Likes/dislikes					
Hobbies					
Religion					

Home address					
Place of residence					
School or work address					
Personal security/identification number					
Telephone or cell phone number					
A picture of you					
Pictures/videos of me uploaded by me or by others					
My online status					
My list of contacts/"friends"					
Comments/messages posted by other users on my "public profile" (meant to be viewed by others)					
Applications I use					
Other, please specify:					

4. ANSWER THE FOLLOWING QUESTIONS IN RELATION TO THE PRIVACY SETTINGS AVAILABLE ON THIS SNS

In relation to the privacy settings available on the site...	Yes	No	Not available on this website	Observations
The instructions on how to use the privacy settings are written using plain and succinct language, easy for Minor 1 to understand				
The instructions on how to use the privacy settings do not contain excessive technical jargon difficult for a child of this age to understand				
The instructions on how to use the privacy settings are easily seen because they are prominently placed on the SNS				
there is no need to excessively scroll the webpage(s) to find instructions on how to change privacy settings				
The privacy settings can be accessed at all times from the SNS				

There is a link to the privacy settings on every page on this SNS				
I could successfully restrict access to my personal information to Minor 2 without encountering any difficulties in the whole process				
I could restrict access to my personal information to Minor 2, but I encountered some difficulties during the process (please specify which difficulties you encountered in the comments section)				
I could successfully block Adult 2 without encountering any difficulties in the whole process				
I could block Adult 2, but I encountered some difficulties during the process (please specify which difficulties you encountered in the comments section)				

IN THIS LAST TASK YOU WILL HAVE TO EVALUATE HOW EASY IT IS TO DELETE AN EXISTING USER PROFILE ON THIS SNS. AS ALL YOUR PREVIOUS PROFILES SHOULD REMAIN ACTIVE EVEN AFTER THE TEST HAS FINISHED, YOU WILL HAVE TO CREATE A NEW USER ACCOUNT). PLEASE KEEP IN MIND THAT NONE OF YOUR PREVIOUS ACCOUNTS SHOULD BE DELETED.

- CREATE A NEW USER ACCOUNT FOR JEREMY REYNARD, 13 (FRÉDÉRIC REYNARD'S BROTHER).
- FILL IN JEREMY'S PERSONAL INFORMATION (NAME, AGE, HOBBIES, ETC.) BASING YOURSELF ON THE INFORMATION ABOUT JEREMY CONTAINED IN FRÉDÉRIC'S PERSONA
- UPLOAD A COUPLE OF PICTURES TO THIS PROFILE
- DELETE THIS ACCOUNT
- ONCE YOU HAVE DELETED JEREMY'S PROFILE, ANSWER THE FOLLOWING QUESTIONS:

5. HOW EASY WAS IT TO DO THE FOLLOWING?

On the SNS, how easy was it to...?	Very easy	easy	Not easy but not difficult	difficult	Very difficult	Not available on this SNS
Delete Minor's 3 profile?						
Find instructions on how to delete Minor 3?						
Find information on the consequences of deleting your profile (e.g. your profile will be deleted, but some information will be retained by the provider, etc.)						

6. WHAT HAPPENED WHILE DELETING “MINOR 3” PROFILE?

While deleting your “Minor 3” profile:	YES	NO	Observations
I could find easy-to-understand information on how to delete/deactivate my profile			
There was a clear link/button provided for deleting/deactivating my profile			
I could only deactivate my profile but not completely delete it			
The provider clearly states what personal information they collect/retain after deleting/deactivating my profile			
The provider clearly states how my personal information is/may be used once my profile is deleted/deactivated			

Alternative ways of implementing Principle 6 on this SNS website

1. Here refer to any alternative ways this Principle has been implemented on this specific website and which has not been included in this test
2. Clearly specify the places on the website where such information/application(s) is/are placed by adding link(s) to the application/functionality in question, links to relevant additional information on the website, etc.

ANNEX 4. DESCRIPTION OF PARTICIPATING SOCIAL NETWORKING SITES



The following is a description of the Social Networking Sites (SNS) that have signed the "Safer Social Networking Principles for the EU" and who have participated in the Phase A of the Second Assessment of the Principles.

ARTO

Arto.com is a social networking site whose core user base is made up by teenagers. It has a minimum age requirement of 12 years old. Users create a profile where they can choose how to inform visitors about themselves. The design process of this is decided solely by the user, and he or she may decide how much information is given to visitors.

Through several features on the site the users keep in touch with friends from the real world and new friends made on the site. This includes a guestbook, which is the main tool for communication, a hidden mail system, a public chat with private rooms, a chat tool for talking with friends which also offers microphone and webcam support. Arto also offers the users a forum divided into different categories where they may discuss certain topics with other users. We have a club-section where our users may create fan clubs on any given topic (a soccer team, cartoons, school, games, idols etc) and these clubs all feature a secluded club profile, forum, gallery, calendar and file sharing system for the members of the club.

The users may create and manage blogs, galleries with pictures and video, post messages on a bulletin board, share high resolution photos from events and travels, and play games with and against other users. Other features include the possibility for users to create quizzes for their friends and new relations to answer, and we have an Idol section that allow the creative user to upload videos of them and their friends singing, dancing, juggling or other talents they may wish to share and the community may rate and comment the videos they upload.

BEBO

Bebo is an online community where members can find and communicate with others as well as browse and share user-generated content. Users interact with friends' profiles, send messages to other users, join groups, become fans of bands, use third party applications and games, and upload and share photos and videos. Users must be 13 or older to use Bebo. Users can add their [AOL Instant Messenger](#) (AIM), [Skype](#) and [Windows Live Messenger](#) user names to their Bebo profile.

Bebo was founded in 2005, it operates globally and many different languages but is most popular in Ireland, the United Kingdom and New Zealand. AOL acquired the site from its founders in 2008 and they subsequently sold it to Criterion Capital Partners in 2010. Figures from marketing firm comScore show the monthly users in February 2010 were 3.8 million.

FACEBOOK

Facebook is an online community where members can find and communicate with others as well as browse and share user-generated content. Users interact with friends' profiles, send messages to other users, join groups, become fans of pages, use third party applications and games, and upload and share photos and videos. Users must be 13 or older to use Facebook. Users can communicate synchronously with other users using the Facebook chat application.

Facebook was founded in 2004. It operates globally and in many different languages. Facebook is the most used social networking site in the world. According to Facebook there are more than 500 million active users and 50% of the active users log on to the site on any given day.

Giovani

Giovani is an Italian SNS held by the Internet Company Banzai. The company has incorporated Studenti Media Group, an internet group born in 2007 which runs other community services targeted to young people such as Studenti.it, and Girlpower.it. Giovani has 2.807.222 registered users, as stated in the top left box on the homepage. The community is age restricted to those younger than 13 years old. The SNS offers users the possibility to create their own profiles, a personal blog, and a photo and/or video gallery. A further feature recently added to the service is the possibility to upload their photo albums on a photo sharing site managed by AltaVista (part of Banzai). Users can also join groups, and participate in discussions in the forum. The forum contains the following threads: Sex; love; news and politics; literature; music; TV and cinema; mobile phones; videogames; computer and the internet; sport; editorial staff forum; helpline; XXX (erotic content X-rated).

HYVES

Hyves is one of the most popular social network sites in The Netherlands and counts more than 10,6 million members³⁶. This social network platform started in 2004 and is available in two languages (Dutch and English). The founders refer with the name of their social network site to a beehive, full of activity. Members can keep contact with friends and meet new people. Next to their profile, users can develop and consult blogs, post comments on profile pages, upload and browse through users' pictures and videos. Also 'gadgets' can be added to one's own profile (embedded third party applications). Next, classifieds can be published and games can be played online. Moreover, users can create groups ('Hyves') that gather persons sharing, for instance, the same interests. The social network site has also created a mobile application, giving the opportunity to be connected everywhere. Persons younger than 16 years old need parental permission to subscribe. According to a study, three quarters of the Dutch 8 till 17-year-olds has a profile on Hyves³⁷.

³⁶ Including 9 million members in The Netherlands. Source: *Hyves in numbers* webpage (<http://www.hyves.nl/about/facts/>), information retrieved on the 16th of December 2010

³⁷ *Krabbels & Respect plz? Hyves en Kinderen*, September 2009, <http://www.mijnkindonline.nl>

IRC-Galleria

IRC-Galleria is available in Finland and in the Finnish language. IRC-Galleria has existed since December 2000. The current number of users is 451047 (14.12.2010 <http://irc-galleria.net/>). The age requirement is 12 years. Users of IRC-Galleria may create profiles, add pictures, videos and blog texts, make questionnaires for other users, post comments on other users' profiles and join site communities. By buying applications, users can for instance update their guest list, add logos or applications to their profile or add their picture or community on the front page of the site.

Sulake is a social entertainment company focused on online social places and games. Sulake's main product Habbo Hotel is the world's largest virtual community and social game environment for teenagers.

Myspace

Myspace is an online community where members can find and communicate with others as well as browse and share content. Users interact with friends' profiles, send messages to other users, join groups, become fans of bands, use third party applications and games, and upload and share photos and videos. The site is focused on the 13-35-year-old demographic and users must be at least 13 years old to create a profile. Myspace has traditionally focused on music and friends but its new goal is to become "the leading entertainment destination that is socially powered by the passions of fans and curators." Users can integrate their Myspace with their Twitter and Facebook accounts. It operates globally in over 20 different languages.

Nasza-klasa

Nk.pl (short name of nasza-klasa.pl) is a social networking site gathering Internet users who want to find their friends. Thanks to nk.pl it is possible to rebuild relations with colleagues from kindergarten, primary school, high school, college - in a word - from the past and also - to contact ones present friends and/or family. Nk.pl was created by four students: Maciej Popowicz, Paweł Olchawa, Michał Bartoszkiewicz and Łukasz Adziński and has been operating since 11th of November 2006. Today there are almost 14 million active profiles on this website (active means that each month each User at least once visits nk.pl).

Nk.pl offers many social features which help people 'stay in touch'. Users can create their own profiles, join school and class profiles, gather their friends, send internal messages, upload photos, leave comments on profiles and under photos and chat with friends via the forum, the internal instant messenger and the microblogging tools.

Almost 80% of nasza-klasa.pl users are adults, but this number doesn't change the fact that we try to protect our younger visitors.

Netlog

Netlog is an online community for young people to make friends by building a digital identity, sharing experiences and playing games. The community of Netlog counts over 60 million members and is growing by half a million every week. Netlog is targeted at youngsters aged 14 to 24, and so far it is available in 37 languages. The platform of Netlog is developed by Netlog NV, a company based in Ghent, Belgium.

ONE.LT

ONE.LT is a social networking site serving over one million internet users in Lithuania as well as a sizeable Lithuanian-speaking internet user audience in other countries.

ONE.LT offers a variety of social features helping people express themselves and stay in touch with their real-life and virtual friends. ONE.LT enables users to create and accessorize online profiles, establish friend connections with other users on the site, exchange private in-site messages, upload and showcase photos, post notes to forums attached to individual user profiles and user groups, rate user photos, join public online clubs dedicated to specific themes or topics, send virtual gifts to friends and participate in other online communication activities of similar nature.

As of Q1 2009, ONE.LT is accessed by over 900 thousand unique users a month, generating nearly 1 billion page views a month. While the significant majority of ONE.LT users are above 18 years of age, ONE.LT does provide services to younger users and considers its responsibility to work toward ensuring their safety, providing protection against abuse and inappropriate content.

RATE.EE

Rate.ee is the largest social networking site in Estonia. Launched in 2002 offering a simple picture rating service it has since grown to a fully fledged online community featuring friends' lists, blogs, albums, and many other services. It has now over 300,000 active users comprising a one fifth of the population. EMT, the largest telecom company in the country, acquired a majority stake in Rate.ee in 2006.

SchuelerVZ

The platform schuelerVZ is one of the three social networking sites of VZnet Netzwerke Ltd. provided for the German market (studiVZ and meinVZ are the other two). It is aimed at German pupils from 12 to 21 years. SchuelerVZ exists since four years ago. Today, 5.8 million pupils are users of schuelerVZ.³⁸ Registered users are represented by a profile site where they publish certain personal information like hobbies, favourite music or popular movies as well as pictures. They can add other users as their "friends", create or join groups where they can engage in discussions about topics they are interested in, and use channels for interpersonal communication such as direct messages or chat. SchuelerVZ is a stand-alone platform that is not open for general registration (new users need an invitation of an actual user to be able to join) and allows no interaction (e.g. no messages or friend requests) with users of studiVZ or meinVZ.

Tuenti

Tuenti is a Spanish-based Social Networking Site, the most popular amongst teenagers and young adults (14-25) in the country. It has only one language version in Spanish. It started in January 2006. It is the second largest SNS in Spain after Facebook, with 8 million users³⁹.

Tuenti features many tools common to social networking sites. It allows users to set up a profile, upload photos, link videos and connect with friends; it also offers a chat application and some other utilities, such as the ability to create events. A mobile version of the SNS is offered to users, with some specific features (users' mobile phone number only appear on the mobile version).

ZAP

ZAP is a free-access social networking website ("community platform") in Luxembourg for people aged 12 and above. Due to the three main languages that are spoken in the country, ZAP offers Luxembourgish, German, and French versions of the site. It provides information on event schedules, nightlife reports, user profiles, homepages, and photos that may be used on mobile devices or web browsers. Users of ZAP may present and describe themselves for social purposes using public messages, friend lists, a mailing system, and picture and video upload functions. Although exact numbers are missing, ZAP claims to have a penetration of 65% in its target audience in Luxembourg (<http://www.zap.lu/lu/p10458/index.html>, accessed 10-12-2010). In 2010, the company launched the international version of its services under ZAPOn.com.

³⁸ Source: <http://www.schuelervz.net/l/schueler/3/>, accessed Dec. 17th, 2010.

³⁹ http://www.elpais.com/articulo/economia/presidente/Tuenti/abandona/cargo/compra/Telefonica/red/social/elpepieco/20100805elpepieco_4/Tes

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